

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402994119

Date Received:
03/24/2022

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

1 of 2 CAs from the FIR responded to on this Form

0 CA Completed
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1675 BROADWAY, STE 2800

City: DENVER State: CO Zip: 80202

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name

Phone

Email

Rickard, Jeff

JRickard@kpk.com

.KPK

cogcc@kpk.com

LLC, Marcom

PrimaryContractor@marcomllc.net

Axelson, John

john.axelson@state.co.us

Gorka, Ray

RGorka@kpk.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 689501343

Inspection Date: 03/22/2022

FIR Submit Date: 03/23/2022

FIR Status: _____

Inspected Operator Information:

Company Name: KP KAUFFMAN COMPANY INC

Company Number: 46290

Address: 1675 BROADWAY, STE 2800

City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 318931

Location Name: UPRR 42 PAN AM D-62N66W Number: 21NWNE County: _____

Qtrqr: NWNE Sec: 21 Twp: 2N Range: 66W Meridian: 6

Latitude: 40.128986 Longitude: -104.781416

FACILITY - API Number: 05-123- -00 Facility ID: 470886

Facility Name: UPRR 42 Pan Am D 2 battery Number: _____

Qtrqr: NWNE Sec: 21 Twp: 2N Range: 66W Meridian: 6

Latitude: 40.128986 Longitude: -104.781416

CORRECTIVE ACTIONS:

1 CA# 160338

Corrective Action: Submit an Initial Form 19 Spill/Release report to document spill clean-up. Operator will provide notice to COGCC EPS Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any additional sampling events performed on location.

Date: 03/24/2022

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: Detailed explanation is in the attached PDF document.

COGCC Decision: **Not Approved**

COGCC Representative: This Factual Resolution Request is not approved for the following reasons:

- 1) Factual Resolution Request Process is specific to eight categories. Disagreement about a spill reporting threshold is not one of those categories.
- 2) Operator indicates that 1.44bbbls infiltrated the based of unlined secondary containment, however COGCC inspectors witnessed an ongoing spill and Operator recovering free fluids at the time of the 3/21/2022 inspection, the volume of recovered fluids have not been included.
- 3) Operator indicates that 24 cubic yards were removed, this is reportable under Rule 912.b.(1).E.

COGCC Supervisor: Factual Resolution Request for a CA to submit a Form 19 is not applicable, as a result, the request is not approved.

OPERATOR COMMENT AND SUBMITTAL

Comment:

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Jeff Rickard

Signed:

Title: Regulatory

Date: 3/24/2022 10:45:37 AM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
402994119	FIR RESOLUTION SUBMITTED
402994122	Factual Review Response

Total Attach: 2 Files