

State of Colorado
Energy & Carbon Management Commission



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Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:
403466924

Date Received:
07/17/2023

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

7 of 10 CAs from the FIR responded to on this Form

7 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 46290
Name of Operator: KP KAUFFMAN COMPANY INC
Address: 1700 LINCOLN ST STE 4550
City: DENVER State: CO Zip: 80203

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Victoria Dizghinjili</u>	<u>303-825-4822</u>	<u>vdizghinjili@kpk.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 697602135
Inspection Date: 07/10/2023 FIR Submit Date: 07/11/2023 FIR Status: _____

Inspected Operator Information:

Company Name: KP KAUFFMAN COMPANY INC Company Number: 46290
Address: 1700 LINCOLN ST STE 4550
City: DENVER State: CO Zip: 80203

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# 175118

Corrective Action: Repair or install berms or other secondary containment devices per Rule 912.d.(1). Date: 07/31/2023

Response: CA COMPLETED Date of Completion: 07/17/2023

Operator Comment: Damaged berms have been repaired. Please see attached oicture.

COGCC Decision: **Not Approved**

Per Inspection Document #710100047 Earthen berm where produced water AST and former crude oil AST

COGCC Representative: are/were located has been replaced with loose unconsolidated and permeable dirt. Attempted repairs are inadequate.

2 CA# 175119

Corrective Action: Per Rule 1105.b, Upon removing a flowline or crude oil transfer line from use with the intent to abandon, an operator must immediately apply OOSLAT to the risers. OOSLAT must stay in place at all times during the process of abandoning the flowline or crude oil transfer line until the operator removes the riser.

Date: 07/12/2023

Response: CA COMPLETED

Date of Completion: 07/12/2023

Operator Comment: 3" risers have been cut, other risers have been logged out and tagged. please see attached pictures.

COGCC Decision: **Not Approved**

COGCC Representative: Per Inspection Document #710100047 A single lock out tag has been installed on one flowline riser within the earthen secondary containment berm for the produced water and former crude oil ASTs.

3 CA# 175120

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a. Remove free fluids and contact COGCC EPS staff per Rule 912.b.

Date: 07/12/2023

Response: CA COMPLETED

Date of Completion: 07/12/2023

Operator Comment: Stained soil has been removed. please see attached picture.

COGCC Decision: **Not Approved**

COGCC Representative: Attached pictures (document nos. 403467018 & 403467028) show fresh, non-impacted soil has been placed in the berm and where impacted soil was previously observed. On July 28, 2023, ECMC environmental staff inspected (document no. 710100047) the spill area and observed stained soil in-situ in the spill area which appeared to have been covered by freshly applied fill material. ECMC staff collected a soil sample from the impacted area and submitted the sample for laboratory analysis. Analytical results (document no. 1561575) demonstrated exceedances of Table 915-1 concentrations of Total Petroleum Hydrocarbon (TPH), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, benzo(a)anthracene, fluorene, 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene.

COGCC Supervisor: Operator filed an inaccurate FIR Resolution Form reporting impacted soil had been removed from the tank battery, violating Rule 207.

4 CA# 175121

Corrective Action: Comply with Rule 606.

Date: 07/26/2023

Response: CA COMPLETED

Date of Completion: 07/17/2023

Operator Comment: All unused equipment and trash have been removed.

COGCC Decision: **Not Approved**

COGCC Representative: Per Inspection Document #710100047 Some equipment listed in the previous inspection has been removed; however, unused equipment remains on location.

5 CA# 175122

Corrective Action: Per Rule 603.h, Oil and Gas Facilities will be adequately fenced to restrict access by unauthorized persons.

Date: 07/21/2023

Response: CA COMPLETED

Date of Completion: 07/17/2023

Operator Comment: Wire fence has been repaired.

COGCC Decision: **Not Approved**

COGCC Representative: Per Inspection Document #710100047 Barbed wire fencing on location around the earthen secondary containment berm for the 210-bbl steel produced water AST and former crude oil AST remains partially downed.

6 CA# 175123

Corrective Action: Comply with Rule 606.

Date: 07/18/2023

Response: CA COMPLETED

Date of Completion: 07/17/2023

Operator Comment: Weeds have been removed.

COGCC Decision: **Not Approved**

COGCC Representative: Per Inspection Document #710100047 Weeds remain throughout the location.

7 CA# 175124

Corrective Action: Maintain active and inactive flowlines and crude oil transfer lines to meet rule 1102.i.

Date: 07/12/2023

Response: CA COMPLETED

Date of Completion: 07/12/2023

Operator Comment: Valves have been locked.

COGCC Decision: **Not Approved**

COGCC Representative: Per Inspection Document #710100047 Flowlines or crude oil transfer lines not maintained to prevent failures or leakage connected to the former tank. Integrity issues not corrected. Valves not locked and tagged out.

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: Victoria dizghinjili

Signed:

Title: Engineering Tech

Date: 7/17/2023 3:13:50 PM

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>
403466924	FIR RESOLUTION SUBMITTED
403467018	CA completed PIC1
403467028	CA completed PIC2

Total Attach: 3 Files