

State of Colorado
Energy & Carbon Management Commission



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

Document Number:
403498625

Date Received:
08/16/2023

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

5 of 8 CAs from the FIR responded to on this Form

5 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: 710100050
Inspection Date: 08/07/2023 FIR Submit Date: 08/12/2023 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: _____

Location Name: _____ Number: _____ County: _____
Qtrqtr: SWSE Sec: 24 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.118628 Longitude: -104.835437

FACILITY - API Number: 05-123-00 Facility ID: 484896

Facility Name: Facility 9 Section 1415 Corp Unit C Number: _____
Qtrqtr: SWSE Sec: 24 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.118628 Longitude: -104.835437

CORRECTIVE ACTIONS:

1 CA# 178312

Corrective Action: Operator shall control and contain spills/releases and clean up per Rule 912.a. Date: 08/07/2023

Response: CA COMPLETED Date of Completion: 08/07/2023

Operator Comment: When 3rd party construction company struck the flowline KPK immediately started remediation work. This remediation work is progressing every day. All supplemental forms will be submitted to ECMC.

COGCC Decision: **Not Approved**

COGCC Representative: Operator has not documented cleanup per Rule 912.a.

2 CA# 178313

Corrective Action: Operator will ensure the flowline is isolated and depressurized; wells and isolation valves are SI/OOSLAT to prevent an unintentional release. Operator shall provide information/documentation of any utility locate requests/markings of the flowline prior to the date of the spill. Operator shall provide a copy of the latest flowline pressure testing data and chart, as well as, provide a map (and GPS coordinates) depicting location of the valves used to isolate the flowline by means of a Form 19 Supplemental Report, or if the spill report has been closed, by means of a Supplemental Form 27.

Date: 08/19/2023

Response: CA COMPLETED Date of Completion: 08/08/2023

Operator Comment: The flow line was isolated and has been cut and capped on both ends before being backfilled.

COGCC Decision: **Not Approved**

COGCC Representative: Operator has not provided the required documentation. Note: Date of Completion provided by Operator is incorrect. ECMC staff observed the flowline being cut and cap during an inspection performed on August 11, 2023.

3 CA# 178314

Corrective Action: Remediation Safety fence Rule 913.b.(5)B.

Date: 08/12/2023

Response: CA COMPLETED Date of Completion: 08/08/2023

Operator Comment: The remediation work is in progress. No fence has been installed around the ditch, but there is a 2.5' earthen berm along the extent of the ditch to prevent access. Please see attached picture.

COGCC Decision: **Not Approved**

COGCC Representative: An earthen berm along the extent of the ditch is inadequate. Operator is required to fence or cover open trench/excavation to prevent access when sites are not attended Remediation Safety fence Rule 913.b.(5)B.

6 CA# 178317

Corrective Action: Operator shall install booms properly to completely cover the surface of the stream, booms should be replaced when saturated to prevent desorption.

Date: 08/13/2023

Response: CA COMPLETED Date of Completion: 08/09/2023

Operator Comment: Booms have been installed in many places to prevent spreading. Booms are replaced when they are saturated. Please see attached pictures.

COGCC Decision: **Not Approved**

COGCC Representative: Oil absorbent booms have not been properly installed/maintained; free product has been observed on the posterior side of oil absorbent booms.

8 CA# 178319

Corrective Action: Install and maintain BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts the spill footprint to minimize contact with stormwater and precipitation.

Date: 08/12/2023

Response: CA COMPLETED Date of Completion: 08/12/2023

Operator Comment: 2.5' earthen berm has been installed along the extent of the ditch to prevent access. Stained soil on the berms has been cleaned up.

COGCC Decision: Approved pending re-inspection

COGCC
Representative: _____

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: 8/16/2023 10:58:31 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>
403498625	FIR RESOLUTION SUBMITTED
403498685	Booms installed PIC1
403498688	Berms PIC2
403498691	Booms installed PIC3
403498695	Work in progress PIC4

Total Attach: 5 Files