

State of Colorado
Energy & Carbon Management Commission



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

Document Number:
403765932

Date Received:
04/23/2024

FIR RESOLUTION FORM

Overall Status:

CA Summary:

8 of 9 CAs from the FIR responded to on this Form

8 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

ECMC 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>

ECMC INSPECTION SUMMARY:

FIR Document Number: 710100192
Inspection Date: 04/22/2024 FIR Submit Date: 04/22/2024 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: 318207

Location Name: DITLEV-SIMONSEN C-62N67W Number: 31NESW County: _____
Qtrqtr: NESW Sec: 31 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.093323 Longitude: -104.935819

FACILITY - API Number: 05-123-00 Facility ID: 485898

Facility Name: Facility 4 @ Ditlev C1 Number: _____
Qtrqtr: NESW Sec: 31 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.093323 Longitude: -104.935819

CORRECTIVE ACTIONS:

1 CA# 194534

Corrective Action:

Date: 04/26/2024

Comply with ECMC Rules:

Operator shall immediately control and contain spills/releases and clean up per Rule 912.a.

Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts (photo documentation and waste disposal manifests) to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR.

Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.

ECMC observed the Operator remaining out of compliance with Rule 912 on April 22nd, 2024.

CA due date listed as CA due date on FIR Doc #710100190 when corrective action was required.

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: A Form 27 (Doc ID #403692354) was submitted 3/8/24 and approved by ECMC on 3/28/24. A Form 19 summarizing everything including Manifests of Disposal and requesting closure and transfer to Form 27 was submitted on 4/2/2024 (Doc ID #403739815). Still in process with ECMC. This response applies for CAs in previous FIRs: #710100133, #710100167, #710100190.

ECMC Decision: _____

ECMC Representative: _____

2 CA# 194535

Corrective Action: Per CA on FIR Doc #710100133: "Operator shall immediately install, repair and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences/schools, depth of excavation, presence of ground or surface water, livestock, wind, etc.".
Compliance with Rule 913.b.(5)B.i. and ECMC Guidance 913.b.(5)B. i.-v. was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024.
CA due date back dated to CA due date on FIR Doc #710100133. Immediate corrective action is required.

Date: 02/05/2024

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: Fencing has been maintained. Please see attached pictures. This response applies for CAs in previous FIRs: #710100133, #710100167, #710100190.

ECMC Decision: _____

ECMC Representative: _____

3 CA# 194536

Corrective Action: Operator shall comply with Rules 606.c. and 1003.f. by March 14, 2024.
ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024.
CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action.

Date: 03/14/2024

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: Weeds have been removed from location. Please see attached pictures. This response applies for CAs in previous FIRs: #710100133, #710100167, #710100190.

ECMC Decision: _____

ECMC
Representative:

4 CA# 194537

Corrective Action: Per FIR Doc #697602260: "Comply with Rule 606." Compliance with Rule 606 was required by February 21, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602260 when issue was first noted.

Date: 03/14/2024

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: Trash and debris observed on location have been removed. Please see attached pictures. This response applies for CAs in previous FIRs: #697602260, #710100133, #710100167, #710100190.

ECMC Decision:

ECMC
Representative:

6 CA# 194539

Corrective Action: Operator shall comply with Rule 1002.e. Access roads shall be located, adequately sized, constructed, and maintained so as to reasonably control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and April 22nd, 2024. CA due date back dated to CA due date on FIR Doc #710100167 when issue first required corrective action.

Date: 03/29/2024

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: Access road has been maintained. Please see attached pictures. This response applies for CAs in previous FIRs: #697602260, #710100133, #710100167, #710100190.

ECMC Decision:

ECMC
Representative:

7 CA# 194540

Corrective Action: Per FIR Doc #697602260: "Comply with Rule 606." Compliance with Rule 606 was required by February 21, 2024. ECMC observed the Operator remaining out of compliance with Rule 606 on February 29th, March 1st, April 3rd and 22nd, 2024. CA due date back dated to CA due date on FIR Doc #697602260 when issue was first noted.

Date: 02/21/2024

Response: CA COMPLETED

Date of Completion: 04/22/2024

Operator Comment: Unused miscellaneous supplies/equipment stored on location have been removed. This response applies for CAs in previous FIRs: #697602260, #710100133, #710100167, #710100190.

ECMC Decision:

ECMC
Representative:

8 CA# 194541

Corrective Action:

Date: 03/07/2024

Per FIR Doc #697602260: "Properly treat or dispose of E&P waste in accordance with Rule 905."

Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts to the next Supplemental Form 19 per Rule 905.b.(3). Additionally, Operator shall manage waste in compliance with Rule 913.b.(5)B and ECMC Guidance 913.b.(5)B i.-v. and install BMPs in accordance with 1002.f.(2) to prevent runoff and runoff and completely contain impacts. Operator shall provide photo documentation of stockpile liner integrity via Form 19 or Form 27 prior to removal. Operator shall collect soil samples from the areas where impacted soil has spilled outside containment Full Table 915-1 Contaminants of Concern.

Compliance with Rule Rule 905 was required on February 5, 2024. ECMC observed the Operator out of compliance on February 29th, March 1st, April 3rd and 22nd, 2024. Immediate corrective action is required.

Response: CA COMPLETED

Date of Completion: 04/02/2024

Operator Comment: A Form 27 (Doc ID #403692354) was submitted 3/8/24 and approved by ECMC on 3/28/24. A Form 19 summarizing everything and requesting closure and transfer to Form 27 was submitted on 4/2/2024 (Doc ID #403739815). Still in process with ECMC.

ECMC Decision: _____

ECMC Representative: _____

9 CA# 194542

Corrective Action: Per CA on FIR Doc #710100133: "In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered."
Per CA on FIR Doc #697602260: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."
Impacts to soil and groundwater remain insitu. CA due date backdated to due date on FIR Doc #697602260.

Date: 02/19/2024

Response: CA COMPLETED

Date of Completion: 04/02/2024

Operator Comment: A Form 27 (Doc ID #403692354) was submitted 3/8/24 and approved by ECMC on 3/28/24. A Form 19 summarizing everything and requesting closure and transfer to Form 27 was submitted on 4/2/2024 (Doc ID #403739815). Still in process with ECMC.

ECMC Decision: _____

ECMC 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: ET

Date: 4/23/2024 1:11:45 PM

ATTACHMENT LIST

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

Document Number	Description
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403766134	Fencing repair, weeds removed PIC1
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403766140	Road maintained, trash removed PIC2
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Total Attach: 2 Files