

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:

400648213

Date Issued:

08/05/2014

## NOTICE OF ALLEGED VIOLATION

Per Rule 522, where the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV). Per Rule 523, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

### OPERATOR INFORMATION

OGCC Operator Number: 46290	Contact Name and Telephone:
Name of Operator: K P KAUFFMAN COMPANY INC	Name: Susana Lara-Mesa
Address: 1675 BROADWAY, STE 2800	Phone: (303) 825-4822 Fax: ( )
City: DENVER State: CO Zip: 80202	Email: slaramesa@kpk.com

### Location Information:

API Number: 05-123-00	Facility Number: 437627
Well Name: Consolidation Unit # 8	Well Number: 437627
QtrQtr: SWSW Sec: 1	TwP: 1N Range: 67W Meridian: 6
County: WELD	

### ALLEGED VIOLATION

Rule: <u>303</u>	Rule Descr: <u>Requirements for Form 2, Application for Permit-to-Drill, Deepen, Re-enter, or Recomplete and Operate; Form 2A, Oil and Gas Location Assessment</u>
Initial Discovery Date: <u>06/30/2014</u>	Was this violation self-reported by the operator? _____
Date of Violation: <u>06/30/2014</u>	Approximate Time of Violation: _____
Description of Alleged Violation:	Was this a discrete violation of obvious duration? _____
<p>Operator started moving emission control devices (ECDs) and a compressor onto an expanded and modified Oil and Gas Location without an approved Form 2A per Rule 303.b.(1)B around the end of June 2014. They finished moving the equipment to the modified location around July 15, 2014. COGCC discussed this issue with the Operator late June 2014 and they immediately agreed to complete the Form 2A and the associated notification processes and contacted the third party surveyor to start the required work. The Operator also wanted to meet with the COGCC first to ensure their plan for the location would suffice prior to submittal. That meeting was held on July 15, 2014 after being originally scheduled and cancelled on July 11, 2014. The move of the equipment was done to become compliant with the setback issue identified in Rule 605.a.(5), to add compression to resolve a line pressure issue, and to move the ECDs further away from the nearby resident's house.</p>	
Abatement or Corrective Action Required to be Performed by Operator: _____	
Corrective Action Due Date: <u>10/15/2014</u>	
<p>Start the Form 2A process on July 15, 2014 as discussed and provide all necessary information to the COGCC timely as the process allows.</p>	

  

Rule: <u>605</u>	Rule Descr: <u>OIL AND GAS FACILITIES</u>
Initial Discovery Date: <u>06/10/2014</u>	Was this violation self-reported by the operator? _____
Date of Violation: <u>06/10/2014</u>	Approximate Time of Violation: _____
Description of Alleged Violation:	Was this a discrete violation of obvious duration? _____
<p>On June 10, 2014, COGCC inspector found that the three emissions control devices on location were within 75 feet of a production tank with the closest being 54 feet. Rule 605.a.(5) requires a setback of 75 feet.</p>	
Abatement or Corrective Action Required to be Performed by Operator: _____	
Corrective Action Due Date: <u>07/10/2014</u>	
<p>Within 30 days, either move the emissions control devices or the production tanks to ensure compliance with the safety setback of 75 feet as required in Rule 605.a.(5). COGCC recognizes that this violation was corrected prior to the issuance of this NOAV.</p>	

  

Rule: <u>912</u>	Rule Descr: <u>Venting or Flaring Natural Gas</u>
Initial Discovery Date: <u>06/11/2014</u>	Was this violation self-reported by the operator? _____
Date of Violation: <u>06/11/2014</u>	Approximate Time of Violation: _____
Description of Alleged Violation:	Was this a discrete violation of obvious duration? _____
<p>On June 11, 2014, COGCC Inspector noticed a one foot long orange flame above one of the ECDs that occurred for a few seconds and then went away and did not return. After discussion with KPK, this was determined to occur from an upset condition which is allowed under Rules 805.b.(3).B.v and 912.b. However, COGCC Staff believes this is a violation of Rule 912.d since the flame went outside of the controlled ECD and did not flare "as efficiently as possible to provide maximum reduction of air contaminants where practicable and without endangering safety...".</p>	
Abatement or Corrective Action Required to be Performed by Operator: _____	
Corrective Action Due Date: <u>07/21/2014</u>	
<p>Provide best engineering practices or redundancy to prevent occurrences of flames leaving the ECD stack. COGCC recognizes that this violation was corrected prior to the issuance of this NOAV.</p>	

### NOAV Issued

NOAV Issue Date: <u>08/05/2014</u>	
COGCC Representative: _____	Title: <u>Deputy Director - Field O</u>
Rep. Email: <u>dave.kulmann@state.co.us</u>	Phone Num: <u>(303) 894-2100 x5189</u>

### CORRECTIVE ACTION

Rule: 303 Rule Descr: Requirements for Form 2, Application for Permit-to-Drill, Deepen, Re-enter, or Recomplete and Operate; Form 2A, Oil and Gas Location Assessment

Corrective Action Start Date: Corrective Action Complete Date:

Has corrective action for this violation been performed as required?

Corrective Action Description:

Rule: 605 Rule Descr: OIL AND GAS FACILITIES

Corrective Action Start Date: Corrective Action Complete Date:

Has corrective action for this violation been performed as required?

Corrective Action Description:

Rule: 912 Rule Descr: Venting or Flaring Natural Gas

Corrective Action Start Date: Corrective Action Complete Date:

Has corrective action for this violation been performed as required?

Corrective Action Description:

## FINAL RESOLUTION

Cause #: Order #: Docket #:

Enforcement Action: Refer to Enforcement Group Date:

Certified Mail Return Receipt Attached ☐

Final Resolution Date:

Final Resolution Comments:

## Attachment Check List

**Att Doc Num** **Name**

400648213	
400656600	NOAV SUBMITTED

Total Attach: 2 Files

## General Comments

**User Group** **Comment** **Comment Date**

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Total: 0 comment(s)