



1120 Lincoln Street, Suite 801
Denver, CO 80203
www.colorado.gov/cogcc

WARNING LETTER # 402315430

02/18/2020

KP KAUFFMAN COMPANY INC (#46290)
ROSS WATZMAN
rwatzman@kpk.com

1675 BROADWAY, STE2800
DENVER, CO 80202

WAGNER 1 (API# 075-08616)
NWSE, 30, 11N, 55W, LOGAN

This Warning Letter is to inform you that KP KAUFFMAN COMPANY INC (“Operator”) may be in violation of the rules and regulations of the Colorado Oil and Gas Conservation Commission (“COGCC”) and corrective action is required.

COGCC has reasonable cause to believe that Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

Alleged Violation(s) and Required Corrective Action(s):

316B Mechanical Integrity Test

Violation Date: 01/17/2020

Violation Discovery Date: 02/18/2020

Description of Alleged Violation: Operator is receiving this letter because, based on COGCC records, COGCC has reason to believe the Well(s) indicated above and/or in the attached table presents one or more compliance issues. Operator should review its records to verify if any Forms or Notices related to mechanical integrity test (“MIT”) are outstanding for this Well.

Pursuant to Rules 316B. and 316C.f., Operator is required to notify COGCC of intent to perform MIT by submitting Form 42 Notice of Mechanical Integrity Test (“Form 42 MIT”) at least 10 days prior to the performance of such test.

If Operator performed a mechanical integrity test and failed to submit Form 42 MIT at least 10 days in advance of the test date, Operator violated Rules 316B. and 316C.f. Form 21, Mechanical Integrity Test was to be submitted within 30 days of the test being performed.

Required Corrective Action: Operator shall submit any delinquent forms, notices, or reports. Operator



COLORADO

**Oil & Gas Conservation
Commission**

Department of Natural Resources

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shall send an email to the COGCC Representative indicated below, detailing an internal procedure for timely compliance with Rules 316B. and 316C.f. Operator shall reference this Warning Letter document number in the subject of the email.

Corrective Action Deadline Date: 02/28/2020

How to Comply with Warning Letter:

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the COGCC staff identified below by the Corrective Action Deadline Date(s):

COGCC Representative: Diana Burn
Email: diana.burn@state.co.us

Title: Eastern Region Engineerin
Phone Num: (303) 894-2100x5106

If you have any questions about this Warning Letter, please contact the COGCC Representative identified above.

Failure to Comply with Warning Letter:

If Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above COGCC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

Disclaimers:

If the alleged violation(s) in this Warning Letter are the subject of previously issued Notice(s) of Alleged Violation ("NOAV") or Enforcement Order(s) ("Order"), Operator's obligations and the corrective actions and deadlines in such NOAV or Order stand and are not affected by this Warning Letter.

If issued in error, the Enforcement Unit reserves the right to rescind this Warning Letter prior to the COGCC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.

All well data, rules and forms are available on our website at www.colorado.gov/cogcc.

Sincerely,

Diana Burn
Eastern Region Engineerin

Attachments

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

Document Number Description

<u>Document Number</u>	<u>Description</u>

Total Attach: 0 Files