

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402610261

Date Received:

02/25/2021

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

0 CA Completed
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 46290
Name of Operator: KP KAUFFMAN COMPANY INC
Address: 1675 BROADWAY, STE 2800
City: DENVER State: CO Zip: 80202

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

Additional Operator Contact:

Contact Name	Phone	Email
<u>Knop, Max</u>	<u>303-825-4822</u>	<u>MKnop@kpk.com</u>
<u>.KPK</u>		<u>cogcc@kpk.com</u>
<u>Canfield, Chris</u>		<u>chris.canfield@state.co.us</u>
<u>MacLaren, Joe</u>		<u>joe.maclaren@state.co.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 691201387
Inspection Date: 02/22/2021 FIR Submit Date: 02/24/2021 FIR Status: _____

Inspected Operator Information:

Company Name: KP KAUFFMAN COMPANY INC Company Number: 46290
Address: 1675 BROADWAY, STE 2800
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: _____

Location Name: _____ Number: _____ County: _____
Qtrqtr: NWNE Sec: 23 Twp: 1N Range: 67W Meridian: 6
Latitude: 40.043630 Longitude: -104.854920

FACILITY - API Number: 05-123-00 Facility ID: 478005

Facility Name: H. Huett Consolidation Release Number: _____
Qtrqtr: NWNE Sec: 23 Twp: 1N Range: 67W Meridian: 6
Latitude: 40.043630 Longitude: -104.854920

CORRECTIVE ACTIONS:

1 CA# 146847

Corrective Action: Per previous CA's Operator shall provide sample location diagram, summary table of analytical results compared to table 915-1 standards, analytical lab reports, disposal manifests and gate tickets, and documentation on the source/location and volume of the clean fill dirt imported on site via supplemental Form 19 no later than 45 days from the Spill Report Date (10/29/2020).

Date: 10/29/2020

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: Comments provided by the inspector are not accurate and do not reflect actual CA's associated with Spill/Release ID 478005. CA's required in Insp Doc #690102098 were addresses with the submittal of Supplemental Form 19 Doc #402495172. Additional CA's related to Spill/Release ID 478005 were addressed with the submittal of Form 27 Doc #402537539. No soil samples have been collected from this location as excavation of impacted soils has yet to be completed.
Inspector inaccurately notes, "Per previous CA's Operator shall provide sample location diagram, summary table of analytical results compared to table 915-1 standards, analytical lab reports, disposal manifests and gate tickets, and documentation on the source/location and volume of the clean fill dirt imported on site via supplemental Form 19 no later than 45 days from the Spill Report Date (10/29/2020)." Table 915-1 standards were not applicable until the January 15, 2021 rule change effective date. Table 915-1 was never referenced in historical CA's associated with Spill/Release ID 478005.

COGCC Decision: **Not Approved**

COGCC Representative: Supplemental Form 19 Doc #402495172 addressed requirements in Insp Doc #690102098 regarding water well and surface water sampling. No additional documentation was provided in Form 27 Doc #402537539. Analytical data regarding soil sampling, as required by Corrective Action, has not been submitted to the COGCC. As Operator has not completed an environmental investigation prior to January 15, 2021 Operator is required to comply with Table 915-1.

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: Max Knop

Signed: _____

Title: Gen Mangr of Air Quality

Date: 2/25/2021 9:40:53 AM

ATTACHMENT LIST

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

Document Number	Description
402610261	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files