

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402531023

Date Received:
11/12/2020

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

1 of 2 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>Pesicka, Conor</u>		<u>conor.pesicka@state.co.us</u>
<u>Ferrin, Jeremy</u>		<u>jeremy.ferrin@state.co.us</u>
<u>Leonard, Mike</u>		<u>mike.leonard@state.co.us</u>
<u>Gomez, Jason</u>	<u>303-825-4822</u>	<u>jason.gomez@state.co.us</u>
		<u>cogcc@kpk.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 693503763
Inspection Date: 11/10/2020 FIR Submit Date: 11/10/2020 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: 467175

Location Name: KPK Tank Battery Number: 28SWNE County: _____
Qtrqtr: SWNE Sec: 28 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.111493 Longitude: -104.891663

FACILITY - API Number: 05-123- -00 Facility ID: 467173

Facility Name: KPK Tank Battery Number: 28SWNE
Qtrqtr: SWNE Sec: 28 Twp: 2N Range: 67W Meridian: 6
Latitude: 40.111493 Longitude: -104.891663

CORRECTIVE ACTIONS:

2 CA# 144320

Corrective Action: Gas being vented or flared during non-upset condition without prior approval from COGCC.

Date: _____

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: The ECD pilot light was lit during the time of inspection. Lease operator provided information to the inspector during the inspection on Tuesday, November 10, 2020 confirming that the pilot light was lit. Inspector disregarded information provided by lease operator. Lease operator shut in ECD and adjusted pilot light position so that it could be more easily viewed. Lease operator again provided information to the inspector that metal inside the ECD was warm to the touch, indicating the ECD pilot had been lit prior to being shut in. Inspector once again disregarded information provided at the time of inspection. Produced gas was being sold at the time the inspection occurred. No bypass or upset conditions or malfunctions occurred at the time of inspection, eliminating the possibility that venting or flaring activities were occurring.

The ECD on location is specific to the control of storage tank emissions: working losses, breathing losses, and flashing losses. Control of these specific storage vessel emissions does not warrant approval from the COGCC for venting or flaring. The storage vessels at the HORST-SCHUTT tank battery are not required to be controlled per AQCC Regulation No. 7. KPK voluntarily controls storage vessel emissions at this location through the operation of the ECD. An unlit pilot light is not a violation of any rule or regulation at a voluntarily controlled location.

COGCC Decision: Approved pending re-inspection

COGCC Representative: At time of inspection Pilot was not lit. I physically opened cap to make sure. My conversation with pumper was about ECD having a mechanical issue due to the fact that is was the second time pilot was out in 6 days. We also discussed Marvin E Unit #1 complaint about gate being open. Not at any time during my time on location did pumper discuss adjusting pilot light or metal being warm this is a false statement. Pumper spoke with environmental state personal.

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: 11/12/2020 9:27:06 AM

ATTACHMENT LIST

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

Document Number **Description**

402531023	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files