



1120 Lincoln Street, Suite 801  
Denver, CO 80203  
[www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

## OUTCOME NOTICE for WARNING LETTER # 402315430

01/22/2023

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

1675 BROADWAY, STE 2800  
DENVER, CO 80202

Re: Warning Letter # 402315430  
Date Issued 02/18/2020

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

**This Outcome Notice is to inform you of the status of the violation(s) alleged in the above referenced Warning Letter.**

### 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 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

Corrective Action Performed by Operator



**COLORADO**

**Oil & Gas Conservation  
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

[www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

Description: Form 21 submitted, Form 5A submitted - no request for continued TA status

**Outcome of Warning Letter # 402315430: Enforcement Action**

MIT done 11/17/2019 - F21 submitted 6/9/20; Form 5A documenting BP set 1/14 submitted 7/21/20; last request for TA 2015 - no subsequent requests; no FIRR for outstanding Corrective Actions on FIR; response to this Warning Letter indicated that processes were being updated to assure that all documentation provided - no TA request yet received (annual requirement until 4/2023)

**Other Violations:**

If COGCC has reasonable cause to believe that KP KAUFFMAN COMPANY INC has additional violations not addressed through the above referenced Warning Letter, the COGCC may 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. COGCC may or may not elect to issue Warning Letters for additional instances of non-compliance based on the guidance of the COGCC Enforcement Guidance and Penalty Policy (Corrected 4/8/2015) and COGCC Rules.

Sincerely,

Diana Burn  
Eastern Region Engineerin  
(303) 894-2100x5106  
[diana.burn@state.co.us](mailto:diana.burn@state.co.us)

**Attachments**

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

**Document Number    Description**

402315430	WARNING LETTER OUTCOME NOTICE
402315729	WARNING LETTER ISSUED

Total Attach: 2 Files