

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:  
403425391

Date Received:  
06/07/2023

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

4 of 9 CAs from the FIR responded to on this Form

4 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 46290  
Name of Operator: KP KAUFFMAN COMPANY INC  
Address: 1700 LINCOLN ST STE 4550  
City: DENVER State: CO Zip: 80203

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Victoria Dizghinjili</u>	<u>303-825-4822</u>	<u>vdizghinjili@kpk.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 710100032  
Inspection Date: 06/01/2023 FIR Submit Date: 06/05/2023 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: KP KAUFFMAN COMPANY INC Company Number: 46290  
Address: 1700 LINCOLN ST STE 4550  
City: DENVER State: CO Zip: 80203

LOCATION - Location ID: 467175

Location Name: KPK Tank Battery Number: 28SWNE County: \_\_\_\_\_  
Qtrqr: SWNE Sec: 28 Twp: 2N Range: 67W Meridian: 6  
Latitude: 40.111793 Longitude: -104.891716

FACILITY - API Number: 05-123-00 Facility ID: 476532

Facility Name: HORST-SCHUTT PW Storage Vessel Number: \_\_\_\_\_  
Qtrqr: SWNE Sec: 28 Twp: 2N Range: 67W Meridian: 6  
Latitude: 40.111793 Longitude: -104.891716

CORRECTIVE ACTIONS:

3  CA# 172052

Corrective Action: Per CA on Doc #710100026: Operator shall comply with Rules 606.d.(1)-(3) and 906.a.-d. Date: 05/31/2023

Response: CA COMPLETED Date of Completion: 05/31/2023

Operator Comment: Trash was removed from location.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC personnel performed a follow up inspection on June 14, 2023 (Field Inspection Report Doc #697602113). During this inspection trash/debris and weeds were observed within the open excavation. This corrective action is incomplete.

4  CA# 172053

Corrective Action: Operator shall immediately install, repair and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by rule 913.b.(5)B.i and COGCC Guidance 913.b.(5)B i-v which requires Operators fence or cover open remediation excavations to prevent access when sites are not attended. The site was not attended at the time of the inspection.

Date: 06/06/2023

Response: CA COMPLETED

Date of Completion: 06/06/2023

Operator Comment: KPK reviewed the documentation provided to the COGCC in FIRR 403419884 and recognized that the photo attachment documenting fence repair on May 25, 2023 had inadvertently been substituted with a photo from May 11, 2022 as noted by the COGCC. KPK has resubmitted a picture of the fence repair from May 24, 2023 herein. As you know, Weld county experienced significant storm events between May 25, 2023 and when the COGCC revisited the site on June 1, 2023. We recognize from your photographs that additional damage to the fencing had occurred during that time and attribute that to those storm events. We have replaced/repared the fencing at the site today, 6/6/2023 and have attached photographs documenting current site conditions. This response is for CA #17400 FIR #710100026 too.

COGCC Decision: Approved

COGCC Representative: COGCC personnel performed a follow up inspection on June 14, 2023 (Field Inspection Report Doc #697602113). During this inspection COGCC personnel noted fencing around the open excavation had been repaired. This corrective action is complete. Operator shall perform routine inspections and maintenance as required by rule.

7  CA# 172056

Corrective Action: Refer to location, environmental, reclamation sections and inspection photos for corrective actions and documentation of site conditions at the time of inspection.

Date: \_\_\_\_\_

Response: CA COMPLETED

Date of Completion: 06/06/2023

Operator Comment: KPK has reviewed document #1311101 and agrees with the COGCC that comments on the Form 27 (#403110153) were in fact provided to KPK. We apologize for any confusion that our inaccurate response to CA171607 may have caused. KPK's statement in FIRR #403419884 that the Form 27 (#403110153) was returned to draft without comments was incorrect. KPK is in the process of updating all out-of-compliance and/or insufficient Form 27s for active remediation sites in Colorado. KPK will ensure that the COGCC comments in document #1311101 will be addressed in any subsequent submittal.

COGCC Decision: **Not Approved**

COGCC Representative: This corrective action is tied to the complaint (Doc #403408837) with an open ended due date as it refers to all incomplete corrective actions listed in the field inspection forms (Doc #710100026 and #710100032); as such, this corrective action will remain incomplete until Operator has completed all the corrective actions outlined on document numbers 710100026 and 710100032.

8  CA# 172057

Corrective Action: In accordance with Rule 913.e.(3), Operator will adopt and maintain a quarterly reporting schedule. Operator will maintain quarterly reporting until the site investigation is complete and the implementation schedule can be updated.  
  
Corrective Action date back dated to the last Form 27s due date for Remediation Project #23124.

Date: 08/09/2022

Response: CA COMPLETED

Date of Completion: 06/06/2023

Operator Comment: KPK is aware of the outstanding monitoring and reporting for the active remediation projects 23124 and 14115 and have placed them in the queue with all of KPKs spill/release and remediation sites that are currently active.

COGCC Decision: **Not Approved**

COGCC Representative: Corrective action is incomplete until Operator is up to date with quarterly reporting.

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: John D Peterson

Signed: \_\_\_\_\_

Title: Director EHS & Compliance

Date: 6/7/2023 11:44:08 AM

### ATTACHMENT LIST

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

<b>Document Number</b>	<b>Description</b>
403425391	FIR RESOLUTION SUBMITTED
403425987	Repaired fence after storm PIC1
403425988	Repaired fence after storm PIC2
403425990	Repaired fence after storm PIC3
403425991	Repaired fence on May 24th PIC4

Total Attach: 5 Files