

State of Colorado  
Energy & Carbon Management Commission



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Document Number:  
403723300

Date Received:  
03/18/2024

## FIR RESOLUTION FORM

### Overall Status:

#### 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	Contact Name and Telephone:
Name of Operator: KP KAUFFMAN COMPANY INC	Name: _____
Address: 1700 LINCOLN ST STE 4550	Phone: ( ) _____ Fax: ( ) _____
City: DENVER State: CO Zip: 80203	Email: _____

#### Additional Operator Contact:

Contact Name	Phone	Email
<u>Victoria Dizghinjili</u>	<u>303-825-482</u>	<u>vdizghinjili@kpk.com</u>

### COGCC INSPECTION SUMMARY:

FIR Document Number: 713300681  
Inspection Date: 03/12/2024 FIR Submit Date: 03/12/2024 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: 318381

Location Name: UPRR 43 PAN AM G-61N67W Number: 29NESE County: WELD  
Qtrqtr: NESE Sec: 29 Twp: 1N Range: 67W Meridian: 6  
Latitude: 40.020250 Longitude: -104.906580

#### FACILITY - API Number: 05-123-00 Facility ID: 241194

Facility Name: UPRR 43 PAN AM G Number: 12  
Qtrqtr: NESE Sec: 29 Twp: 1N Range: 67W Meridian: 6  
Latitude: 40.020250 Longitude: -104.906580

### CORRECTIVE ACTIONS:

1 CA# 192985

Corrective Action: Produce well after performing successful mechanical integrity test per Rule 417 or plug well. To maintain shut-in status, the well must be able to demonstrate ability to produce without mechanical intervention.

Date: 04/12/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

Operator Comment: This well does not fit the definition of Temporarily Abandoned as defined in ECMC 100 Series rules. Instead, this well is Shut-in due to the ECMC Director's 901.a Order dated April 12, 2021. It is capable of production without a downhole intervention, removal of a plug, or addition of equipment. KPK disagrees with the requirement to conduct an MIT on this well and has previously requested a partial withdrawal of the 901.a Order and the ability

to unload well liquids thereby resetting the clock for MIT testing. In the alternative, KPK proposed continuously monitor bradenhead pressures to satisfy the MIT requirement; this practice was previously approved and implemented by another operator. KPK renews it request to unload the Shut-in 901.a Order wells.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**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: Victoria Dizghinjili

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

Title: ET

Date: 3/18/2024 3:23:30 PM

**ATTACHMENT LIST**

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

<b><u>Document Number</u></b>	<b><u>Description</u></b>
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Total Attach: 0 Files