

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403716674

Date Received:

03/12/2024

## 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: 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

Victoria Dizghinjili

303-825-4822

vdizghinjili@kpk.com

### OGCC INSPECTION SUMMARY:

FIR Document Number: 713300668

Inspection Date: 03/07/2024

FIR Submit Date: 03/07/2024

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: 317795

Location Name: HARRIET W LUCKE-61N67W Number: 28NWSW County: WELD

Qtrqr: NWS Sec: 28 Twp: 1N Range: 67W Meridian: 6  
W

Latitude: 40.020230 Longitude: -104.902570

### FACILITY - API Number: 05-123- -00 Facility ID: 239984

Facility Name: HARRIET W LUCKE Number: 1

Qtrqr: NWS Sec: 28 Twp: 1N Range: 67W Meridian: 6  
W

Latitude: 40.020230 Longitude: -104.902570

### CORRECTIVE ACTIONS:

1 CA# 192942

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: 04/08/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

This well does not fit the definition of Temporarily Abandoned as defined in ECMC 100 Series rules. Instead, this

Operator Comment: 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: **Not Approved**

COGCC Representative: KPK's request with respect to MIT requirements at wells subject to the Rule 901.a Order was never granted. Therefore, the requirements of Rule 417 and the corrective actions contained in this inspection, remain outstanding.

COGCC Supervisor: KPK's request with respect to MIT requirements at wells subject to the Rule 901.a Order was never granted. Therefore, the requirements of Rule 417 and the corrective actions contained in this inspection, remain outstanding.

#### 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: 3/12/2024 2:34:56 PM

### ATTACHMENT LIST

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

<u>Document Number</u>	<u>Description</u>
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403716674	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files