

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403724732

Date Received:  
03/19/2024

## 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: 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: 702403184  
Inspection Date: 03/13/2024 FIR Submit Date: 03/13/2024 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: 336292

Location Name: STROMQUIST-62N68W Number: 21SESW County: WELD  
Qtrqr: SESW Sec: 21 Twp: 2N Range: 68W Meridian: 6  
Latitude: 40.118610 Longitude: -105.010640

### FACILITY - API Number: 05-123-00 Facility ID: 241704

Facility Name: MILTON H. NELSON UNIT B Number: 1  
Qtrqr: SESW Sec: 21 Twp: 2N Range: 68W Meridian: 6  
Latitude: 40.118610 Longitude: -105.010640

### CORRECTIVE ACTIONS:

2 CA# 193011

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: 04/13/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

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: **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: 3/19/2024 12:58:05 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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403724732	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files