

State of Colorado
Energy & Carbon Management Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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Document Number:
403815946

Date Received:
06/06/2024

FIR RESOLUTION FORM

Overall Status:

CA Summary:

2 of 2 CAs from the FIR responded to on this Form

0 CA Completed
2 Factual Review Request

OPERATOR INFORMATION

ECMC 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

ECMC INSPECTION SUMMARY:

FIR Document Number: 694500667
Inspection Date: 05/30/2024 FIR Submit Date: 06/04/2024 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:

Location Name: Number: County:
Qtrqtr: SENW Sec: 2 Twp: 9N Range: 79W Meridian: 6
Latitude: 40.782049 Longitude: -106.233094

FACILITY - API Number: 05-057-00

Facility ID: 486848

Facility Name: Overflow Tank Number:
Qtrqtr: SENW Sec: 2 Twp: 9N Range: 79W Meridian: 6
Latitude: 40.782049 Longitude: -106.233094

CORRECTIVE ACTIONS:

1 CA# 195617

Corrective Action: provide Sundry, Form 4, stating the purpose of the tank and intended use. The operator shall provide an evaluation of placarding the tank and secondary containment. Date: 06/19/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment is not owned or controlled by the operator

Operator Comment: The inspector identifies an above ground steel tank (AST) with no tank labels, signs, or placards. The corrective action required was to provide evaluation of placarding the tank and secondary containment. ECMC inspector administratively added the tank as a facility in COGIS under ID 486848. The inspector also labeled the tank in the registration as an overflow tank based on verbal information provided to the inspector by a previous operator at least 5 years ago since KPK acquired the asset in 2018. KPK has no information that corroborates this

speculation.

The AST in question has been inspected by KPK's Field Supervisor Mr. Jeff Boxley. Upon investigation, it was confirmed that this AST is not part of KPK's operations and never has been. It does not appear to be connected to any other equipment. The AST is empty and KPK does not have any information about its history, installation date, or its use. Based on its construction, it appears to be a water tank. The tank definitely does not contain petroleum hydrocarbons and does not require secondary containment. There is no oil and gas production processes associated with this tank and it is likely not under the jurisdiction of the ECMC.

KPK disagrees with the administrative addition of a tank and creation of a new facility ID attributed to KPK by ECMC Staff based on speculation. Please delete this facility ID from COGIS as it is not part of KPK's operations. If KPK identifies additional information during our contractual document review for these assets, KPK will provide the information upon discovery.

ECMC Decision: _____

ECMC Representative:

2 CA# 195618

Corrective Action: provide Sundry, Form 4, stating the purpose of the tank and intended use. The operator shall provide an evaluation of placarding the tank and secondary containment.

Date: 06/19/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment is not owned or controlled by the operator

Operator Comment:

The inspector identifies an above ground steel tank (AST) with no tank labels, signs, or placards. The corrective action required was to provide evaluation of placarding the tank and secondary containment. ECMC inspector administratively added the tank as a facility in COGIS under ID 486848. The inspector also labeled the tank in the registration as an overflow tank based on verbal information provided to the inspector by a previous operator at least 5 years ago since KPK acquired the asset in 2018. KPK has no information that corroborates this speculation.

The AST in question has been inspected by KPK's Field Supervisor Mr. Jeff Boxley. Upon investigation, it was confirmed that this AST is not part of KPK's operations and never has been. It does not appear to be connected to any other equipment. The AST is empty and KPK does not have any information about its history, installation date, or its use. Based on its construction, it appears to be a water tank. The tank definitely does not contain petroleum hydrocarbons and does not require secondary containment. There is no oil and gas production processes associated with this tank and it is likely not under the jurisdiction of the ECMC.

KPK disagrees with the administrative addition of a tank and creation of a new facility ID attributed to KPK by ECMC Staff based on speculation. Please delete this facility ID from COGIS as it is not part of KPK's operations. If KPK identifies additional information during our contractual document review for these assets, KPK will provide the information upon discovery.

ECMC Decision: _____

ECMC 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: 6/6/2024 11:30:04 AM

ATTACHMENT LIST

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

<u>Document Number</u>	<u>Description</u>
403815946	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files