



# COLORADO

## Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

[www.colorado.gov/ecmc](http://www.colorado.gov/ecmc)

### WARNING LETTER # 404273718

07/10/2025

KP KAUFFMAN COMPANY INC (#46290)

ROSS WATZMAN

[rwatzman@kpk.com](mailto:rwatzman@kpk.com)

1700 LINCOLN ST STE 4550

DENVER, CO 80203

Dustin Case ([dcase@kpk.com](mailto:dcase@kpk.com))

SWSW, 34, 2N, 67W, WELD

**This Warning Letter is to inform you that KP KAUFFMAN COMPANY INC (“Operator”) may be in violation of the rules and regulations of the Colorado Energy and Carbon Management Commission (“ECMC”) and corrective action is required.**

ECMC has reasonable cause to believe that Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which ECMC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

#### **Alleged Violation(s) and Required Corrective Action(s):**

##### 912.b. Reporting Spills or Releases of E&P Waste, Gas, or Produced Fluids

Violation Date: 07/08/2025

Violation Discovery Date: 07/08/2025

Description of Alleged Violation: On July 8, 2025, ECMC staff met representatives of a 3rd party and KP Kauffman on location (Insp Doc No 714300184) to determine the responsible party of a historical spill related to flowline ID 478843 discovered during decommissioning of the adjacent EMERSON-62N67W/29SWNE location (Remediation Project No 35614).

ECMC records indicate that KPK is the owner of the pipeline/flowline’s present in the open excavation and is therefore the responsible party on record of the discovered spill (Facility 9 flowline system; Form 44 Document No 402536813). KPK has indicated that the Facility 9 flowline was purchased from DCP and that this segment of the system was not part of the quit claim; KPK has submitted Form 44 Document No 404269951 (In Process) for this assertion.

ECMC staff walked the mapped line path to the east and west of the spill location and discovered markers and utility locates for both KPK and DCP lines in the area. Signs to the east of the spill location indicate KPK operates lines of both 8” and 10” diameter, which is consistent with the GIS layer supplied by KPK in Form 44 Document No 402536813.



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**Required Corrective Action:** Operators (KPK & DCP) shall determine who is the appropriate Operator for the lines and submit a Form 19 spill report within 72 hours. If the responsible party cannot be agreed upon within the reporting deadline both parties should submit a Form 19 detailing how the responsible party will be determined. If DCP is determined to be the Operator of the lines DCP shall also submit a Form 44 documenting these changes.

**Corrective Action Deadline Date:** 07/13/2025

### **How to Comply with Warning Letter:**

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the ECMC staff identified below by the Corrective Action Deadline Date(s):

ECMC Representative: Kari Brown  
Email: [kari.oakman@state.co.us](mailto:kari.oakman@state.co.us)

Title: NE Environmental Protection  
Phone Num: (720) 355-3135x

If you have any questions about this Warning Letter, please contact the ECMC Representative identified above.

### **Failure to Comply with Warning Letter:**

If Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above ECMC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

### **Disclaimers:**

If the alleged violation(s) in this Warning Letter are the subject of previously issued Notice(s) of Alleged Violation ("NOAV") or Enforcement Order(s) ("Order"), Operator's obligations and the corrective actions and deadlines in such NOAV or Order stand and are not affected by this Warning Letter.

If issued in error, the Enforcement Unit reserves the right to rescind this Warning Letter prior to the ECMC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.

All well data, rules and forms are available on our website at [www.colorado.gov/ecmc](http://www.colorado.gov/ecmc).

Sincerely,

Kari Brown  
NE Environmental Protection

### **Attachments**

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

### **Document Number    Description**

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Total Attach: 0 Files