

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404534737  
Date Issued:  
02/05/2026  
Date Resolved:

## NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 523, the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV). Per Rule 525, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

### OPERATOR INFORMATION

ECMC Operator Number: <u>46290</u>	Contact Name and Telephone:
Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>	Name: <u>ROSS WATZMAN</u>
Address: <u>1700 LINCOLN ST STE 4550</u>	Phone: <u>(720) 868-9848</u> Fax: <u>( )</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>	Email: <u>rwatzman@kpk.com</u>

### Well Location, or Facility Information (if applicable):

API Number: 05-123-09573-00 Facility or Location ID: \_\_\_\_\_  
Name: UPRR 43 PAN AM B Number: 3  
QtrQtr: NENW Sec: 3 Twp: 1N Range: 68W Meridian: 6  
County: WELD

### ALLEGED VIOLATION

Rule: 417  
Rule Description: Mechanical Integrity Testing  
Initial Discovery Date: 07/31/2025 Was this violation self-reported by the operator? No  
Date of Violation: 01/31/2026 Approximate Time of Violation: \_\_\_\_\_  
Was this a discrete violation of obvious duration? Yes

#### Description of Alleged Violation:

Pursuant to Rule 417.f., all Wells will maintain mechanical integrity. All Wells which lack mechanical integrity, as determined through a mechanical integrity test ("MIT"), or other means, will be repaired or Plugged and Abandoned within 6 months. If KP Kauffman Company, Inc. ("Operator") has performed an MIT within the 2 years required for Shut-in Wells or the 30 days required for Temporarily Abandoned Wells by this Rule, Operator will have 6 months from the date of the unsuccessful test to make repairs or Plug and Abandon the Well. If Operator has not performed an MIT within the required time frames in Rules 417.b.(1) & c.(1), Operator will not be given an additional 6 months in the event of an unsuccessful test.

Operator submitted a Form 21, MIT on August 4, 2025 (document no. 404304312), for Operator's UPRR 43 Pan AM B #3 well (API No. 05-123-09573, "Well"), for an MIT conducted on July 31, 2025. The Form 21's reported loss in pressure indicated a mechanical integrity failure for the Well. The MIT was performed within two years of the Well being Shut-in; therefore, Operator was required to repair and successfully pass an MIT, or plug and abandon the Well, by January 31, 2026.

ECMC Staff emailed Operator on January 13, 2026 (document no. 404533725), reminding Operator of the requirements to either repair and successfully pass an MIT, or plug and abandon the Well, by January 31, 2026.

On January 14, 2026, Operator submitted a Form 6, Notice of Intent to Abandon the Well (document no. 404505394), documenting uncemented casing leaks in the wellbore. On January 28, 2026, the Form 6 was approved and Operator was permitted to plug and abandon the Well. As of February 5, 2026, Operator has not plugged and abandoned the Well.

Operator failed to repair or plug and abandon the Well, which lacks mechanical integrity, within the required time frames, violating Rule 417.f.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 02/05/2026

**Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.**

Operator will either repair and pass a new MIT, or plug and abandon the Well, immediately. Operator must submit a Form 6, Subsequent Report of Abandonment for confirmation that the Well has been plugged and abandoned or submit a Form 4, Sundry Notice for approval of plans to repair and a Form 21 demonstrating a passing MIT.

### PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 525, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

### ANSWER

Pursuant to Rule 523.c.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgment may be entered. Answers are filed by email to [dnr\\_ecmc\\_enforcement@state.co.us](mailto:dnr_ecmc_enforcement@state.co.us).

### NOAV ISSUED

NOAV Issue Date: 02/05/2026

ECMC Representative Signature: \_\_\_\_\_

ECMC Representative: Trent Lindley Title: NOAV Specialist

Email: trent.lindley@state.co.us Phone Num: (720) 765-0031

### CORRECTIVE ACTION COMPLETED

Rule: 417

Rule Description: Mechanical Integrity Testing

Corrective Action Start Date: \_\_\_\_\_ Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? \_\_\_\_\_

Description of Actual Corrective Action Performed by Operator

### FINAL RESOLUTION

Cause #: \_\_\_\_\_ Order #: \_\_\_\_\_ Docket #: \_\_\_\_\_

Enforcement Action: \_\_\_\_\_ Final Resolution Date: \_\_\_\_\_

Final Resolution Comments:

### 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>
404534742	NOAV CERTIFIED MAIL RECEIPT

