

State of Colorado

Energy & Carbon Management Commission

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Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403672604

Date Received:

02/02/2024

Spill report taken by:

Anderson, Laurel

Spill/Release Point ID:

485956

SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

OPERATOR INFORMATION

Name of Operator: KP KAUFFMAN COMPANY INC	Operator No: 46290	Phone Numbers Phone: (720) 868-9848x0110 Mobile: (303) 550-8872 Email: jpeterson@kpk.com
Address: 1700 LINCOLN ST STE 4550		
City: DENVER	State: CO Zip: 80203	
Contact Person: John Peterson		

☐ Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 403668567

Initial Report Date: 01/28/2024 Date of Discovery: 01/26/2024 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR NESE SEC 2 TWP 1N RNG 67W MERIDIAN 6

Latitude: 40.076797 Longitude: -104.848633

Municipality (if within municipal boundaries): County: WELD

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Reference Location:

Facility Type: OFF-LOCATION FLOWLINE

☒ Facility/Location ID No 478839

Spill/Release Point Name: Facility 8 @ Pehr 12-1

☐ Well API No. (Only if the reference facility is well) 05- -☐ No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): >=1 and <5

Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): >=1 and <5

Estimated Other E&P Waste Spill Volume(bbl): 0

Estimated Drilling Fluid Spill Volume(bbl): 0

Specify:

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: CROP LAND

Other(Specify):

Weather Condition: 45 degrees F, partly cloudy

Surface Owner: FEE

Other(Specify): The Pehr Land Trust

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

Xcel Damage Prevention employee contacted KPK about the spill on 1.26.24. KPK personnel immediately went to the site, shut in the wellheads, and isolated the flowline. KPK mobilized a vac truck to evacuate the flowline. The Hydro-Vac removed fluids/stained soil for offsite disposal. The spill is located between the Kerr McGee Pehr Pooling Unit 1 battery and CR 23. KPK installed a snow fence around the spill. Surface staining was approximately 72 ft2 (6'x12'). See attached pictures.

The spill occurred approximately 20 ft east of CR 23 and roughly 0.2 miles south of Highway 52. Cropland is east of the Kerr McGee battery. KPK notified Weld County of the spill (details attached). If impacts are determined to be within the CR 23 right-of-way, KPK will notify Weld County and obtain the necessary plans/permits to complete the remediation work. KPK will provide notice to ECMC at least 48 hours prior to excavation backfill, soil boring/monitoring well installation, or any sampling events.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
1/26/2024	Weld County	online webform	-	via online OEM website
1/26/2024	ECMC	N. Graber/L. Anderson	-	via email
1/26/2024	Landowner	Pehr Land Trust	303-857-2221	via email

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

Yes Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: n/a

Public Water System: n/a

Residence or Occupied Structure: n/a

Livestock: n/a

Wildlife: n/a

Publicly-Maintained Road: Threatened to Impact

Yes Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____ (HH:MM)

Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____

Enter the Document Number of the Initial Accident Report, Form 22 _____

Was there damage during excavation? _____

Was CO 811 notified prior to excavation? _____

No Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): _____

No	Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply: <input type="checkbox"/> The presence of free product or hydrocarbon sheen Surface Water <input type="checkbox"/> The presence of free product or hydrocarbon sheen on Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Surface water
Yes	Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight's from the subsurface.
No	Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property. <input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

SPILL/RELEASE DETAIL REPORTS

#1	Supplemental Report Date: 01/31/2024		
FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL			<input checked="" type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER			<input checked="" type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
Secondary containment, including walls & floor regardless of construction material , must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.			
A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit			
Impacted Media (Check all that apply) <input checked="" type="checkbox"/> Soil <input type="checkbox"/> Groundwater <input type="checkbox"/> Surface Water <input type="checkbox"/> Dry Drainage Feature			
Surface Area Impacted: Length of Impact (feet): <u>6</u>		Width of Impact (feet): <u>12</u>	
Depth of Impact (feet BGS): _____		Depth of Impact (inches BGS): _____	
How was extent determined?			
Extent of surface staining			
Soil/Geology Description:			
Silty Loam			
Depth to Groundwater (feet BGS) <u>10</u>		Number Water Wells within 1/2 mile radius: <u>25</u>	
If less than 1 mile, distance in feet to nearest	Water Well <u>675</u>	None <input type="checkbox"/>	Surface Water <u>475</u> None <input type="checkbox"/>
	Wetlands <u>1000</u>	None <input type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>
	Livestock _____	None <input checked="" type="checkbox"/>	Occupied Building <u>580</u> None <input type="checkbox"/>
Additional Spill Details Not Provided Above:			

County Road 23 is 20 ft West of site. Highway 52 is 1,120 ft North of site. Twenty-five water wells are within 1/2-mile radius of site; nearest domestic water well is 675 ft Southeast of site (DWR and ECMC GIS tool). An unnamed pond is 475 ft northeast of site. Nearest wetland is located approximately 1,000 ft East of site. Nearest occupied building is 580 ft Southeast of spill. Nearest 100-year floodplain is 2,710 feet East of spill.

The closest High Priority Habitat is 2,630 ft East of the site for Mule Deer Migration Corridor. No springs or livestock within a mile. Depth to groundwater of 100' measured in well 274173 located 675 ft Southeast of spill. ECMC stated DTW is <10' on Form 19 Initial.

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 02/02/2024

Root Cause of Spill/Release Corrosion

Other (specify)

Type of Equipment at Point of Spill/Release: Other

If "Other" selected above, specify or describe here:

Flowline

Describe Incident & Root Cause (include specific equipment and point of failure)

KPK suspects the root cause of the release is corrosion of the flowline. The root cause will be confirmed after excavation to repair the line.

Describe measures taken to prevent the problem(s) from reoccurring:

The steel flowline will be replaced with poly line.

Volume of Soil Excavated (cubic yards):

Disposition of Excavated Soil (attach documentation)



Offsite Disposal

Onsite Treatment



Other (specify)

Volume of Impacted Ground Water Removed (bbls):

Volume of Impacted Surface Water Removed (bbls):

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: ☐ Corrective Actions Completed (documentation attached, check all that apply)

☐ Horizontal and Vertical extents of impacts have been delineated.

☐ Documentation of compliance with Table 915-1 is attached.

☐ All E&P Waste has been properly treated or disposed.

☐ Work proceeding under an approved Form 27 (Rule 912.c).

Form 27 Remediation Project No:

☐ SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

OPERATOR COMMENTS:

On the Form 19 Initial approval, the ECMC requested a list of all wellheads upstream of the spill location. Below is list of the Facility 8 wells that were closed behind the valve.

Achziger, Harry N #1
Achziger, Harry N #2
Ruby B Carlson Unit D #1
Cavanaugh, Frank M #1
Cavanaugh, Frank M #3
Cavanaugh, Frank M #4

Chikuma, Harry S #3
 Clark, Francis Doughty #2
 Doversberger, Eugene #2
 Doversberger, Eugene #3
 Hein #31-1
 Heit, Antone C B #1
 Joseph L Huett Unit C #1
 Inouye #44-36
 Kiefer George W Ut B #1
 Kiefer, George W Unit C #1
 George W Kiefer B #4
 Mary Leinweber #1
 Lewis Trust #33-13
 Mathisen Unit #1
 Mathisen Unit A #2
 George R Norden Unit #1
 Maggie Norden #1
 Maggie Norden B #1
 Alice Pehr Unit D #2
 Martin J Schaefer #1
 Martin J Schaefer #2
 Sebold, Dorothy B #1
 Sebold, Dorothy B #2
 Coulter C Smith #1
 State Of Colorado AF #2
 Stieber #24-24
 Stieber, Edward #1
 Stieber, George B #1
 John Henry Stoltz B #1
 Three Farms #11-23
 Wattenberg, Henry E B #1
 Wattenberg, Henry E B #2
 Wattenberg, Henry E Unit C #1

Please see attached COA response document for KPK's actions based on previous COAs at the site.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: _____ Print Name: Katherine Kahn
 Title: Senior Hydrogeologist Date: 02/02/2024 Email: kkahn@quandaryconsultants.com

COA Type

Description

	<p>Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.</p> <p>The Form 19 Supplemental requesting closure is due by April 25, 2024.</p>
	<p>Operator has indicated no livestock are present within 1 mile of the spill. Livestock are present directly north of the spill. Operator has indicated the nearest wetland is located approximately 1,000 feet east of the spill; however, a riverine wetland is located ~565' east of the spill. Operator shall provide a comprehensive list of all potential receptors within 1 mile of the spill on the subsequent Supplemental Form 19.</p>

	<p>Per COA on Form 19 Initial (Doc #403668567):: "Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered that includes:</p> <p>A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill</p> <p>B. All pertinent information about the spill/release known to the Operator that has not been reported previously including photo documentation showing the source of the Spill or Release, the impacted area, and initial cleanup activity</p> <p>C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator</p> <p>D. Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2).A did not meet the requirements of Rule 216."</p> <p>Operator has not provided photo documentation of the source of the spill. Operator shall provide photo documentation of the flowline failure point and a map depicting the spill extent on the subsequent Supplemental Form 19.</p>
	<p>Operator states: "Once the flowline is exposed the location of the failure will be identified. The root cause of the incident is likely corrosion. If so, the steel line will be replaced with poly line. The root cause and preventative measures will be reported on the next Form 19 Supplemental."</p> <p>In accordance with 912.a.(2) Operator will investigate, cleanup, and document impacts resulting from Spill and Releases as soon as the impacts are discovered.</p>
	<p>Per COA on Form 19 Initial (Doc #403668567): "Operator shall properly dispose of oily waste in accordance with Rule 905.e and attach all waste manifests, gate tickets/receipts for oily waste hauled off site for disposal to the next Supplemental Form 19 per Rule 905.b.(3).". Operator has not provided waste manifests for oily waste hauled off site to date.</p>
	<p>Operator states:"KPK notified Weld County of the spill on 1.26.24. If impacts are determined to be within the County Road 23 right-of-way, KPK will notify Weld County and obtain the necessary plans/permits to complete the remediation work." in response to a COA on Form 19 Initial (Doc #403668567). Operator has also indicated the spill occurred approximately 20 feet east of County Road 23. Weld County. The Weld County Road right-of-way extends 30 feet on each side of County Road 23; therefore, impacts are present within the Weld County right-of-way. Operator shall notify Weld County and obtain a Weld County Right-Of-Way Use Permit if needed.</p>
	<p>Operator states: "Produced water has been added to the type of fluid spilled at the site in the Form 19 Supplemental. The area of surficial staining noted at the time of the spill was 6 ft x 12 ft. If the spill extends 5 ft bgs, the volume of the spill would be 360 ft3, or roughly 13.3 yd3. 10 yd3 of impacted soil is roughly equivalent to a 1 bbl spill, so this estimate seems appropriate based on the currently available information. As the flowline is exposed and the extent of impacts are delineated, this estimated volume may change." in response to a COA on Form 19 Initial (Doc #403668567).</p> <p>Operator provided photo documentation (attachment Doc #403675531) showing liquids pooled above the valve can lid (~6 inches deep). ECMC field inspection report (Doc #710100148) documents the reported removal of enough liquids to necessitate emptying of the Operator's 800-gallon capacity trailer-mounted hydrovac prior to ECMC arrival, followed by additional pooled liquid removal and saturated soil removal via hydrovac upon the crews return. ECMC estimated stained soils to be ~10' by 20'. Assuming six inches of fluid over the stained area ECMC estimates approximately 100 cubic feet of liquid (~748 gallons/~17.8 barrels) was removed via hydrovac prior to ECMC arrival.</p> <p>Operator's estimate and response are egregiously low.</p>
7 COAs	

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403672604	FORM 19 SUBMITTED
403675531	PHOTO DOCUMENTATION
403675533	SITE MAP
403675534	CORRESPONDENCE
403675545	OTHER

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	DWR Permit 274173- is for a residential well completed in the Larmie Fox Hills aquifer. Type III shallow alluvial aquifers in the area have reported depth to water at <10' bgs.	02/05/2024

Total: 1 comment(s)