

Site Name Facility 8 @ Pehr 12-1  
Facility ID 478839  
Spill/Release ID 485956  
Remediation # 35566

Document Date	Document #	Document Type	Condition of Approval (COA)	Corrective Action (CA)	Status	Date Due	Date Resolved	Resolved Doc #
1/28/2024	403668567	Form 19 Initial	Operator has reported the spilled fluids as oil only with an estimated volume spilled between >=1 and <5 bbl. Based on Operator provided photos and field inspections Operator's estimate of the type and volume of spilled fluid is both inaccurate and egregiously low. Operator shall provide explanation of this discrepancy on the next Form 19. Note: Facility 8 Flowline System is registered as multiphase flowline. The Facility 8 South 1 Consolidation and Pehr B, C	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 inside a metal culvert, the volume of this area would be 360 ft <sup>3</sup> , or roughly 13.3 yd <sup>3</sup> . 10 yd <sup>3</sup> of impacted soil is roughly equivalent to a 1 bbl spill, so at the time of reporting, the estimate is appropriate based on the currently available information.	Closed	2/5/2024	2/2/2024	403672604
1/28/2024	403668567	Form 19 Initial	Operator shall provide a list of all wellheads upstream of the spill location on the subsequent Form 19 Supplemental Report.	A list of all wellheads upstream of the spill locations are included on the Form 19 Supplemental.	Closed	2/5/2024	2/2/2024	403672604
1/28/2024	403668567	Form 19 Initial	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).	Manifests are provided in this submittal	Closed	NA	6/20/2024	403816522
1/28/2024	403668567	Form 19 Initial	In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered.	Acknowledged. COA is a reminder of the rules.	NA	NA	NA	NA
1/28/2024	403668567	Form 19 Initial	Operator has had multiple flowline failures in the last week. Per Rule 912.d.(3), Operator is to provide the root cause of the incident and preventative measures that will be taken to prevent reoccurrence on this and other flowlines at this location on the next Form 19 Supplemental. Operator shall provide the location of the failure (i.e. 6 O'clock position) and if the root cause is corrosion explain if it is external or internal.	This information is included in form 19 document number 403816522.	Closed	2/5/2024	6/20/2024	403816522
1/28/2024	403668567	Form 19 Initial	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).	Acknowledged. COA is a reminder of the rules.	NA	NA	NA	NA

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1/28/2024	403668567	Form 19 Initial	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: A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill 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 C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator 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.	Requested information of maps, pertinent information for the spill, site investigation was reported on Form 19 Supplemental document number 403672604 and Form 19 Supplemental doc# 403816522.	Closed	2/5/2024	2/2/2024	403672604
1/28/2024	403668567	Form 19 Initial	If impacts are determined to be within the Weld County Road 23 right-of-way, Operator shall immediately notify Weld County, and if needed obtain a right-of-way permit and develop a traffic plan for additional work along WCR 23. Operator shall include documentation of correspondence with Weld County and any required plans/permits on subsequent Supplemental forms	KPK notified Weld County of the spill on 1.26.24. KPK notified Weld County and obtained the necessary plans/permits to complete the remediation work. The permits and traffic control plan are included in document number 403816522.	Closed	1/26/2024	6/13/2024	403816522
1/28/2024	403668567	Form 19 Initial	Due to shallow groundwater (<10' bgs) reported in nearby wells - Operator shall comply with Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.	Acknowledged	NA	NA	NA	NA
1/28/2024	403668567	Form 19 Initial	Operator will provide email notice to ECMC Area EPS and DJ Basin Region Environmental Supervisor, Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to excavation backfill, soil boring/monitoring well installation, or any sampling events performed on location.	Acknowledged	NA	NA	NA	NA
2/2/2024	403672604	Form 19 Supplemental	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. The Form 19 Supplemental requesting closure is due by April 25, 2024.	Acknowledged. COA is a reminder of the rules.	Closed	4/25/2024	6/13/2024	403816522
2/2/2024	403672604	Form 19 Supplemental	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.	KPK has updated distances to potential receptors in the "additional spill details" section of the Spill/Release detail report in form 19S doc#403816522.	Closed	NA	6/13/2024	403816522

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2/2/2024	403672604	Form 19 Supplemental	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: A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill 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 C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator 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." 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.	This information and photos of the source are included in form 19 document number 403816522.	Closed	NA	6/20/2024	403816522
2/2/2024	403672604	Form 19 Supplemental	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." 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.	Cause of failure was internal corrosion at the 6 o'clock position of the 10" steel line and KPK's preventative measure in place is that the line was stung with 4" poly pipe running 2700' south of Facility 8 to prevent line failure due to corrosion. This information is included in form 19 document number 403816522.	Closed	NA	NA	403816522
2/2/2024	403672604	Form 19 Supplemental	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.	Disposal manifests are provided in form 19s doc#403816522.	Closed	NA	NA	403816522
2/2/2024	403672604	Form 19 Supplemental	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.	KPK notified Weld County of the presence of contamination within CR-23 right of way and obtained a Right-of-Way Use permit that is included in doc#403816522.	Closed	NA	NA	403816522

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2/2/2024	403672604	Form 19 Supplemental	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). 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. Operator's estimate and response are egregiously low	KPK has updated the estimate of oil spilled based on the volume of recovered fluids and the curent excavation dimensions 14' x 36' x 6' at 1 bbl per 10 cubic yards (11 bbls) plus the amount of oil recovered which is 4 bbls for an estimated total of 15 bbls. KPK owns a 10bbl capacity hydrovac tank but does not own a 19 bbl capcity hydrovac tank. The tank was partially filled from a separate remediation site where KPK had removed liquid from an excavation before arriving at the Facility 8@Pehr site. Additionally, the trailer mounted hydrovac does not discriminate between media and will suck out soil and debris along with liquid, which causes liquid displacement, thus filling the tank at a faster rate.	Closed	NA	NA	403816522
5/29/2024	403748394	Form 27 Initial	If field screening is to be used in conjunction with laboratory reports to define the horizontal and vertical impacts, operator shall provide field screening readings when submitting the Form 27 Supplemental Site Investigation. PID's shall be calibrated according to manufacture specifications.	Acknowledged. A PID table will be included in the next form 27 supplemental.	NA	NA	NA	NA
5/29/2024	403748394	Form 27 Initial	Per COA on Form 19i Doc #403668567: "In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered."	Acknowledged. COA is a reminder of the rules.	NA	NA	NA	NA
5/29/2024	403748394	Form 27 Initial	Per COA on Form 19s Doc #403672604: "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-ofway, 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-ofway. Operator shall notify Weld County and obtain a Weld County Right-Of-Way Use Permit if needed." Operator shall provide documentation of correspondence with Weld County and copies of any required plans/permits on subsequent Supplemental Form 27.	KPK notified Weld County of the presence of contamination within CR-23 right of way and obtained a Right-of-Way Use permit that is included in doc#403816522.	Closed	NA	NA	403816522
5/29/2024	403748394	Form 27 Initial	Per COA on Form 19i 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 E&P waste removed during initial spill response activities witnessed by ECMC. Operator shall provide this information on the next quarterly report (due July 10, 2024). Note: Operator has indicated 50 cubic yards of soil has been excavated and disposed offsite.	Waste manifests are included in doc#403816522.	Closed	7/10/2024	6/20/2024	403816522
5/29/2024	403748394	Form 27 Initial	Operator shall collect confirmation soil samples as described in Table 1 of the Rule 915.e.(2) Guidance Document (Published 1/11/2021).	Acknowledged. COA is a reminder of the rules.	Closed	NA	NA	NA

Note:  
NA - not applicable









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