

State of Colorado  
Energy & Carbon Management Commission



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Document Number:

403805446

Date Received:

07/23/2024

### SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to ECMC 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.

Spill report taken by:

Graber, Candice  
(Nikki)

Spill/Release Point ID:

486147

### OPERATOR INFORMATION

Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>	Operator No: <u>46290</u>	<b>Phone Numbers</b>  Phone: <u>(720) 8689848x0110</u> Mobile: <u>(303) 5508872</u> Email: <u>jpeterson@kpk.com</u>
Address: <u>1700 LINCOLN ST STE 4550</u>		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		
Contact Person: <u>John Peterson</u>		

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# 403697018

Initial Report Date: <u>02/23/2024</u>	Date of Discovery: <u>02/22/2024</u>	Spill Type: <u>Recent Spill</u>
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#### Spill/Release Point Location:

QTRQTR SESW SEC 8 TWP 2N RNG 62W MERIDIAN 6  
 Latitude: 40.147487 Longitude: -104.355446  
 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.

Check this box if this spill/release is related to a loss of integrity of a flowline, pipeline, crude oil transfer line, or produced water transfer line.

#### Reference Location:

Facility Type: FLOWLINE SYSTEM  Facility/Location ID No 470262  
 Spill/Release Point Name: Klein 24-8 Flowline  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): <u>0</u>	Estimated Condensate Spill Volume(bbl): <u>&gt;0 and &lt;1</u>
Estimated Flow Back Fluid Spill Volume(bbl): <u>0</u>	Estimated Produced Water Spill Volume(bbl): <u>0</u>
Estimated Other E&P Waste Spill Volume(bbl): <u>0</u>	Estimated Drilling Fluid Spill Volume(bbl): <u>0</u>

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: sunny, 38 degrees

Surface Owner: FEE

Other(Specify): Radley Moore

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

KPK pumper inadvertently over-pressurized the flowline by incorrectly configuring flowline valve positioning, resulting in flowline failure. The failure created a spray of condensate mist at the surface. The pressurized gas and associated condensate within the flowline exposed the line to the surface, creating a hole. The landowner discovered the spill and notified Southeast Weld Fire District who responded to the scene and notified KPK. KPK crews shut in the well and isolated the flowline. Crews scraped the surface of the area surrounding the flowline point of failure and disposed of the contaminated soil.

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

**OTHER NOTIFICATIONS**

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
2/22/2024	ECMC	Justin M & Randy S	-	on site
2/22/2024	ECMC	Nikki Graber/Chris C	-	email
2/22/2024	Land Owner	Radley Moore	-	email
2/22/2024	Southeast Weld Fire District	via phone call	970-888-1345	notified KPK of release

**REPORT CRITERIA**

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

No  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: \_\_\_\_\_ Public Water System: \_\_\_\_\_

Residence or Occupied Structure: \_\_\_\_\_ Livestock: \_\_\_\_\_

Wildlife: \_\_\_\_\_ Publicly-Maintained Road: \_\_\_\_\_

No  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:

The presence of free product or hydrocarbon sheen Surface Water

The presence of free product or hydrocarbon sheen on Groundwater

The presence of contaminated soil in contact with Groundwater

The presence of contaminated soil in contact with Surface water

No 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 from the subsurface.

Yes 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.

Areas offsite of Oil & Gas Location  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: 05/29/2024

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	<u>0</u>	<u>0</u>	<input type="checkbox"/>
CONDENSATE	<u>          </u>	<u>          </u>	<input checked="" type="checkbox"/>
PRODUCED WATER	<u>0</u>	<u>0</u>	<input type="checkbox"/>
DRILLING FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
FLOW BACK FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
OTHER E&P WASTE	<u>0</u>	<u>0</u>	<input type="checkbox"/>

specify: \_\_\_\_\_

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

*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)  Soil  Groundwater  Surface Water  Dry Drainage Feature

Surface Area Impacted: Length of Impact (feet): 16 Width of Impact (feet): 36

Depth of Impact (feet BGS): 4 Depth of Impact (inches BGS): \_\_\_\_\_

How was extent determined?

The surface area reported above is based on the limits of the source excavation area. The source excavation area is approximately 36'W x 16'L. The excavation depth went to 4' only where the flowline was located while the remainder of the excavation was sloped towards the flowline in the center. The impacted surface soil area (56'x57'x0.25') was scraped and excavated by backhoe and transported to a disposal facility. Soil was field screened and sampled. Analytical results show that remediation is complete.

Soil/Geology Description:

Silty sand

Depth to Groundwater (feet BGS) 22 Number Water Wells within 1/2 mile radius: 14

If less than 1 mile, distance in feet to nearest

Water Well	<u>1148</u>	None <input type="checkbox"/>	Surface Water	<u>1436</u>	None <input type="checkbox"/>
Wetlands	<u>5101</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	<u>1656</u>	None <input type="checkbox"/>	Occupied Building	<u>840</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

The directions for each of the potential receptors above are as follows:  
Water well - located approximately 1148 feet west of the site.  
Surface water - Long Draw Creek located approximately 1436 feet east of the site.  
Wetlands - Unnamed wetland approximately 5101 feet northeast of the site.  
Livestock - located approximately 1656 feet southwest of the site.  
Occupied building - farm storehouse located approximately 840 feet west of the site.

### CORRECTIVE ACTIONS

#1 Supplemental Report Date: 05/29/2024

Root Cause of Spill/Release Incorrect Operations (Human Error)

Other (specify) \_\_\_\_\_

Type of Equipment at Point of Spill/Release: Production Line

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

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

The root cause for the spill was the over-pressuring of a flowline by inadvertently using the entire wellhead pressure to troubleshoot a production issue and failing to open inlet valves to the separator. While the operator had more than 20 years of experience (including the operation of this specific well prior to KPK's ownership), complacency resulted in a mistake that damaged the flowline.

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

Management has met with the individual and provided additional training to the pumper when troubleshooting high pressure gas wells. The employee has been disciplined for the error. When experienced team members get comfortable with a high level of performance, they sometimes lose the edge needed to sustain it. This overconfidence and feeling of security can lead to failure.

KPK's standard procedures are to open downstream valves prior to opening the wellhead. Pumpers then partially open the wellhead valve (also called "cracking") while monitoring the pressure gauge to relieve built up pressure. Pumpers leave partially open valves with a lock and revisit the site after 24-hours to confirm that wellhead pressure will not exceed the operating pressure of the infrastructure downstream. Adjustments to optimal operating pressures occur after any overpressure events have been mitigated.

KPK plans to use this event as a training exercise and learning session for all pumpers at the next production department staff meeting to be held on February 28, 2024. Fighting a false sense of security in the workplace can be a day-to-day challenge. KPK's goal is to provide workers with skills so they can be focused, remain aware, respond the right way, and counteract complacency as much as possible.

Volume of Soil Excavated (cubic yards): 12

Disposition of Excavated Soil (attach documentation)  Offsite Disposal  Onsite Treatment

Other (specify) \_\_\_\_\_

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

### 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:

This form serves a request for closure of the spill and request for No Further Action.

Groundwater was not encountered in the excavation or during boring sampling for background samples at depths of 15' bgs. Boring logs are attached. According to nearby well water level data, 1. Well permit #232838 receipt # 0473942 lists depth at 52', static water level at 45'. Well permit #191940—A receipt # 3669618 lists well depth at 79', static water level at 52'. Well permit #21703-FP receipt # 9062868 lists well depth of 382', no static water level provided. Well permit #272654, receipt # 0441258A lists well depth at 82', static water level at 22'. Well permit 249876 receipt # 0505753A lists well depth at 90', static water level at 40'. These 5 wells are those found nearest to the Klein 24-8 location. Attached to this form are boring logs from the site on 3/7/24.

Organics: Exceedances of Table 915-1 were found in SW-1@4' for RRO and TPH, but KPK re-sampled SW-1@4' and found no exceedances of organics.

Metals: Arsenic exceeded Table 915-1 concentrations in every collected soil sample, but concentrations were within site specific background levels.

Soil Suitability: pH exceeded Table 915-1 in several samples but did not exceed site specific background levels.

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

Signed: \_\_\_\_\_ Print Name: Cullen Chew

Title: Environmental Coordinator Date: 07/23/2024 Email: cchew@kpk.com

<u>COA Type</u>	<u>Description</u>
1 COA	The Form 44 for this facility is listed under a different Operator; Operator shall submit a change of ownership to reflect current ownership prior to closing this spill.

**ATTACHMENT LIST**

<u>Att Doc Num</u>	<u>Name</u>
403839178	MAP
403839183	DISPOSAL MANIFEST
403839184	DISPOSAL MANIFEST
403839185	DISPOSAL MANIFEST
403839187	ANALYTICAL RESULTS
403839196	ANALYTICAL RESULTS
403839198	ANALYTICAL RESULTS
403839201	ANALYTICAL RESULTS
403839203	ANALYTICAL RESULTS
403839213	ANALYTICAL RESULTS
403839214	ANALYTICAL RESULTS
403839215	ANALYTICAL RESULTS
403863209	OTHER
403863217	PHOTO DOCUMENTATION

Total Attach: 14 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)