

State of Colorado  
Energy & Carbon Management Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

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Date Received:

02/07/2025

**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:

Anderson, Laurel

Spill/Release Point ID:

488519

**OPERATOR INFORMATION**

Name of Operator: <u>KERR MCGEE OIL &amp; GAS ONSHORE LP</u>	Operator No: <u>47120</u>	<b>Phone Numbers</b>
Address: <u>P O BOX 173779</u>		Phone: <u>(970) 515-0055</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80217-3779</u>		Mobile: <u>( )</u>
Contact Person: <u>Jaron Bartoszek</u>		Email: <u>DJRemediation_Forms@oxy.com</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# 403983480

Initial Report Date: 11/05/2024 Date of Discovery: 11/05/2024 Spill Type: Recent Spill

**Spill/Release Point Location:**

QTRQTR NESW SEC 35 TWP 2N RNG 65W MERIDIAN 6

Latitude: 40.090250 Longitude: -104.631710

Municipality (if within municipal boundaries): Hudson 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: TANK BATTERY  Facility/Location ID No 485208

Spill/Release Point Name: Labrisa 11-35HZ Facility  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): Unknown

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): 0

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: NON-CROP LAND Other(Specify): \_\_\_\_\_

Weather Condition: Overcast ~40s

Surface Owner: FEE Other(Specify): \_\_\_\_\_

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

On November 5, 2024, a release of more than 1 barrel of produced fluids was discovered outside of secondary containment at the Labrisa 11-35HZ Production Facility location. Cleanup and site assessment activities are currently ongoing and will be summarized in a forthcoming Supplemental Form 19 Spill/Release Report. A topographic Site Location Map showing the geographic setting of the release is provided as Figure 1. The State Notification email is provided as Attachment B.

**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>
11/5/2024	Hudson Municipality	Hudson Municipality	-	Notified via email
11/5/2024	Surface Owner	Surface Owner	-	Notified via email
11/5/2024	Weld County	Weld County	-	Notified 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: Threatened to Impact

Residence or Occupied Structure: n/a Livestock: n/a

Wildlife: n/a Publicly-Maintained Road: n/a

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:

- 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.
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: <u>02/05/2025</u>		
<b>FLUIDS</b>	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	<u>1</u>	<u>1</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? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, including walls &amp; floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
<b>A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit</b>			
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>45</u>		Width of Impact (feet): <u>35</u>	
Depth of Impact (feet BGS): <u>4</u>		Depth of Impact (inches BGS): _____	
How was extent determined?			
<p>On November 5, 2024, a release of approximately 1.1 barrels of produced fluids was discovered outside of secondary containment at the Labrisa 11-35HZ Production Facility location. As such, a Form 19-Initial Spill/Release Report (Document No. 403983480) was submitted on November 6, 2024, and the ECMC issued Spill/Release Point ID 488519. On November 5, 2024, a preliminary waste characterization soil sample (WC01@3") was collected from the area most likely to be impacted within the release area, based on field observations, and submitted for laboratory analysis of the full Table 915-1 analytical suite, using standard ECMC approved methods appropriate for detecting the target analytes in Table 915-1. Analytical results indicate that the benzene, toluene, ethylbenzene, total xylenes (BTEX), total petroleum hydrocarbons (TPH), 1,2,4- and 1,3,5-trimethylbenzene (TMB), Acenaphthene, Fluorene, 1-Methylnaphthalene, 2-Methylnaphthalene, and naphthalene in waste characterization soil sample WC01@3" exceeded the applicable ECMC Table 915-1 soil standards. The remaining PAH, soil suitability, and metals concentrations in soil sample WC01@3" were in compliance with ECMC Table 915-1 standards. A topographic Site Location Map showing the geographic setting of the release is provided as Figure 1. The soil samples locations are illustrated on Figures 2 and 3. Soil sample location and field screening data are provided in Table 1. Soil analytical results are summarized in Tables 2 through 5. The laboratory analytical report is provided as Attachment A. Field notes and a photographic log are provided as Attachment B.</p>			
Soil/Geology Description:			
Valent sand, 3 to 9 percent slopes			
Depth to Groundwater (feet BGS) <u>22</u>		Number Water Wells within 1/2 mile radius: <u>6</u>	
If less than 1 mile, distance in feet to nearest	Water Well <u>970</u> None <input type="checkbox"/>	Surface Water <u>1694</u> None <input type="checkbox"/>	
	Wetlands <u>1271</u> None <input type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>	
	Livestock <u>854</u> None <input type="checkbox"/>	Occupied Building <u>854</u> None <input type="checkbox"/>	
Additional Spill Details Not Provided Above:			

On November 5, 2024, through January 21, 2025, excavation and site investigation activities were conducted to address the soil impacts at the release location. Twelve (12) soil samples were collected from the excavation area and were submitted for laboratory analysis of BTEX, N, TPH, 1,2,4- & 1,3,5-TMB, 1- M, 2-M, Benzo(a)anthracene, Acenaphthene, Anthracene, Benzo(b)fluoranthene, Chrysene, Fluoranthene, Fluorene, Pyrene, Boron, and select Table 915-1 metals (As, Ba, Cd, Cu, Pb, and Ni) based on the waste characterization profile created using the analytical results of sample WC01@3". Laboratory analytical results indicate that constituent concentrations in the final confirmation soil samples collected during excavation activities were in compliance with ECMC Table 915-1 standards, and/or site-specific background levels (x1.25 for metals). Groundwater was not encountered during excavation activities. Based on the analytical results presented herein, assessment is complete at the Labrisa 11-35HZ production facility, and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

### CORRECTIVE ACTIONS

#1 Supplemental Report Date: 02/06/2025

Root Cause of Spill/Release Equipment Failure  
Other (specify) \_\_\_\_\_

Type of Equipment at Point of Spill/Release: Other  
If "Other" selected above, specify or describe here:  
LACT Unit Charge Pump

Describe Incident & Root Cause (include specific equipment and point of failure)  
A release was discovered outside of secondary containment at the Labrisa 11-35HZ Production Facility location following the failure of a seal on a LACT unit charge pump.

Describe measures taken to prevent the problem(s) from reoccurring:  
The failed seal gasket has been replaced with a new gasket type, and similar gaskets are in the process of being replaced field-wide.

Volume of Soil Excavated (cubic yards): 324

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:

Laboratory analytical results indicate that constituent concentrations in the final confirmation soil samples collected during excavation activities were in compliance with ECMC Table 915-1 standards, and/or site-specific background levels (x1.25 for metals). Groundwater was not encountered during excavation activities. Based on the analytical results presented herein, assessment is complete at the Labrisa 11-35HZ production facility, and no further activities are required. As such, Kerr-McGee is requesting a No Further Action (NFA) determination for this location.

Per phone conversation, ECMC has agreed to Kerr-McGee requesting a No Further Action determination for this spill via Supplemental

Form 19 only (4 days past the 90 day closure time frame) due to a slight delay in final laboratory analytical report issuance. Closure is pending ECMC approval.

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

Signed: \_\_\_\_\_ Print Name: Jaron Bartoszek  
 Title: Environmental Advisor Date: 02/07/2025 Email: DJRemediation\_Forms@oxy.com

COA Type	Description
0 COA	

**ATTACHMENT LIST**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
404084458	SITE MAP
404084462	SOIL SAMPLE LOCATION MAP
404084465	SOIL SAMPLE LOCATION MAP
404084467	ANALYTICAL RESULTS
404084469	PHOTO DOCUMENTATION
404085567	ANALYTICAL RESULTS
404085568	ANALYTICAL RESULTS
404085569	ANALYTICAL RESULTS
404085570	ANALYTICAL RESULTS

Total Attach: 9 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Environmental	Form Received: 2/6/2025 4:44:53 PM ECMC returned the form to draft on 2/7/2025 per Operator request the same day.	02/07/2025

Total: 1 comment(s)