

**Site Name** Dechant State 3 Flowline  
**Facility ID** 475722  
**Spill/Release ID** 487984  
**Remediation #** 39579

Document Date	Document #	Document Type	Condition of Approval (COA)	Corrective Action (CA)	Status	Date Due	Date Resolved	Resolved Doc #
9/23/2024	403930265	Form 19 Initial	Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.	Contaminated soil has been stockpiled on site. Berms and plastic liner have been installed as containment measures. All waste manifests will be provided on subsequent forms as they are generated.	Closed	NA	NA	NA
9/23/2024	403930265	Form 19 Initial	Operator shall ensure that stormwater does not transport impacts outside of the spill footprint.	Berms and plastic liner have been installed as containment measures to prevent transportation of impacts offsite by stormwater.	Closed	NA	NA	NA
9/23/2024	403930265	Form 19 Initial	Operator will provide notice to ECMC EPS Kari Brown (kari.l.brown@state.co.us) and Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any sampling events performed on location.	Acknowledged	Closed	NA	NA	NA
9/23/2024	403930265	Form 19 Initial	The spill point is located >500' from the mapped flowline alignment as submitted by Operator to ECMC. Pursuant to Rule 1101.b.(3)(C) The GIS data for these off-location flowlines must be the most accurate data possible without using invasive methods AND a minimum horizontal positional accuracy of +/- 25 feet. Operator shall provide an updated flowline alignment via Form 44 within 90 days of spill discovery.	KPK has submitted form 44 document number 404141313 to provide the proper alignment of the flowline.	Closed	12/19/2024	3/26/2025	404141313
9/23/2024	403930265	Form 19 Initial	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.	Acknowledged	Closed	NA	NA	NA
9/23/2024	403930265	Form 19 Initial	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. 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 and describe the cause of corrosion.	The root cause and preventative measures are included in form 19 supplemental document 403935672.	Closed	9/30/2024	9/30/2024	403935672

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9/23/2024	403930265	Form 19 Initial	<p>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>	Acknowledged	Closed	9/30/2024	9/26/2024	403935672
9/30/2024	403935672	Form 19 Supplemental	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)).	KPK will comply with the requirement.	Closed	NA	NA	NA
9/30/2024	403935672	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.	Acknowledged. KPK understands that the submittal of form 19 closure is late. The purpose of form 19 supplemental document number 404131707 is to close the spill.	Closed	12/19/2024	3/31/2025	404131707
9/30/2024	403935672	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.	Acknowledged.	Closed	NA	NA	NA

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9/30/2024	403935672	Form 19 Supplemental	The previously applied COA remains outstanding: The spill point is located >500' from the mapped flowline alignment as submitted by Operator to ECMC. Pursuant to Rule 1101.b.(3)(C) The GIS data for these off-location flowlines must be the most accurate data possible without using invasive methods AND a minimum horizontal positional accuracy of +/- 25 feet. Operator shall provide an updated flowline alignment via Form 44 within 90 days of spill discovery.	KPK has submitted form 44 document number 404141313 to provide the proper alignment of the flowline.	Closed	12/19/2024	3/26/2025	404141313
9/30/2024	403935672	Form 19 Supplemental	The previously applied COA remains outstanding: Operator will provide notice to ECMC EPS Kari Brown (kari.l.brown@state.co.us) and Nikki Graber (nikki.graber@state.co.us) at least 48 hours prior to any sampling events performed on location.	KPK will comply with the requirement.	Closed	NA	NA	NA
9/30/2024	403935672	Form 19 Supplemental	The previously applied COA remains outstanding: Operator shall ensure that stormwater does not transport impacts outside of the spill footprint.	KPK has installed berms around the contaminated areas on site. The contaminated soil has been stockpiled on lined and bermed containment. See photos attached to form 19 document number 404131707.	Closed	NA	3/31/2025	404131707
9/30/2024	403935672	Form 19 Supplemental	The previously applied COA remains outstanding: Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.	All generated waste manifests are included as an attachment to form 19 document 404131707.	Closed	NA	3/31/2025	404131707
9/30/2024	403935672	Form 19 Supplemental	The operator's documentation of the cause of this spill and their description of measures implemented to prevent future releases due to similar causes do not meet the requirements of Rule 912.d. However, this Spill/Release Report is accepted into the record at this time and any issues of non-compliance may be adjudicated as necessary, consistent with staff discretion, in accordance with Commission Rules.	KPK has updated the root cause/preventative measure section of document number 404131707.	Closed	NA	3/31/2025	404131707