

State of Colorado  
Energy & Carbon Management Commission

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Document Number:

404131707

Date Received:

04/02/2025

Spill report taken by:

Anderson, Laurel

Spill/Release Point ID:

487984

**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.

**OPERATOR INFORMATION**

Name of Operator: <u>KP KAUFFMAN COMPANY INC</u>	Operator No: <u>46290</u>	<b>Phone Numbers</b>
Address: <u>1700 LINCOLN ST STE 4550</u>		Phone: <u>(720) 8689848</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>(205) 9144843</u>
Contact Person: <u>Cullen Chew</u>		Email: <u>cchew@kpk.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# 403930265

Initial Report Date: 09/23/2024 Date of Discovery: 09/20/2024 Spill Type: Recent Spill

**Spill/Release Point Location:**

QTRQTR SWSW SEC 16 TWP 2N RNG 67W MERIDIAN 6

Latitude: 40.134581 Longitude: -104.900955

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: OFF-LOCATION FLOWLINE  Facility/Location ID No 475722

Spill/Release Point Name: Dechant State 3 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): Unknown Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): Unknown

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: Sunny, 75 F, Light wind

Surface Owner: STATE

Other(Specify): State of Colorado

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

A KPK employee driving by observed surface staining near a lease road & promptly notified supervisors, ensuring a swift response. The surface staining was not easily visible to the pumpers on the standard route due to a surface depression & vegetation obscuring the view from the standard path.  
 In accordance with our protocols, the possible affected wells were shut in to prevent any further environmental impact. A crew was mobilized to initiate containment and remediation activities. Containment measures were established using berms and plastic liners to securely stage the stained soil pending offsite disposal. Crews will continue excavating and scraping the contamination at the surface. Additional sampling and field screening are required following the removal of the remaining contamination on site. KPK is awaiting pending sampling results after sampling sidewalls from 7 locations and floor samples from 2 locations. The 9 soil samples were submitted for ECMC Table 915-1 analysis.

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

**OTHER NOTIFICATIONS**

Date	Agency/Party	Contact	Phone	Response
9/20/2024	Weld County	Jason Maxey	-	Weld OEM Form
9/20/2024	State of Colorado/ Landowner	Steve Freese	-	Email
9/20/2024	ECMC	Kari Brown	-	Email
9/20/2024	ECMC	Nikki Graber	-	Email

**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: \_\_\_\_\_

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.

Yes 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? \_\_\_\_\_

Yes 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.): 581

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

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 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.

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: 03/18/2025

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
PRODUCED WATER	_____	_____	<input checked="" 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): 302 Width of Impact (feet): 85

Depth of Impact (feet BGS): 6 Depth of Impact (inches BGS): \_\_\_\_\_

How was extent determined?

Through visual observation of surface staining and excavation. KPK will continue the process of delineating the full horizontal and vertical extent of impact by removing contaminated soil and collecting confirmation samples.

Soil/Geology Description:

Sand

Depth to Groundwater (feet BGS) 10 Number Water Wells within 1/2 mile radius: 13

If less than 1 mile, distance in feet to nearest

Water Well	<u>798</u>	None <input type="checkbox"/>	Surface Water	<u>1057</u>	None <input type="checkbox"/>
Wetlands	<u>718</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	<u>2893</u>	None <input type="checkbox"/>	Occupied Building	<u>1764</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Distances to receptors are as follows:  
 Water well: approximately 798 feet northwest of the release point.  
 Surface water: Coal ridge ditch is approximately 1057 feet west of the release  
 Wetlands: a freshwater emergent wetland is located approximately 718 feet west of the release point  
 Livestock: approximately 2893 feet southwest of the release point however the State Land Board has indicated that the parcel directly at the spill site is currently used for grazing livestock. No livestock have been observed at the site to date. The parcel is not fenced and grazing in the area would allow the livestock to enter the roadway.  
 Occupied building: approximately 1764 feet southwest of the release point  
 Nearest static water level determined from CWCB/DWR mapping site showed a static water level at 10' at permit number 120942 receipt number 0215702 located approximately 3072 feet west of the release point.

### CORRECTIVE ACTIONS

#1 Supplemental Report Date: 03/18/2025

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:  
Gathering Line

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

KPK has determined that the point of failure occurred at the 6 o'clock position of a steel dresser sleeve on the 3" fiberglass line. The cause of failure is due to internal corrosion. The operator prior to KPK had placed this sleeve over the fiberglass line. The root cause of this spill is due to inadequate repair measures employed on a fiberglass line by the prior operator of the flowline. Rather than placing a steel sleeve over the fiberglass, the entire section of compromised fiberglass line should have been replaced with new fiberglass and manufacturer's recommended fiberglass fusing technology at each end of the new section. There are many causes of corrosion in buried steel including (but not limited to): age; insulation failure; low pH; hard water; water temperature; microorganisms; chemical and electrochemical reactions; soil type and quality; chlorides; pressure; and/or oxygenated water. In most cases of both internal and external corrosion, more than one of these factors contribute. Every site has the potential for a different combination of contributing factors. In the case of this incident, the steel sleeve should have never been used as a repair alternative due to propensity for future corrosion. These sleeves are not meant for permanent repair on flowlines.

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

KPK replaced the failed section of flowline with 3" fiberglass. KPK fused each end of the replacement section to the existing fiberglass flowline using manufacturer's recommended protocols. KPK plans to investigate all flowlines inherited from previous operators to ensure that there are no additional previous repairs completed incorrectly.

Volume of Soil Excavated (cubic yards): 581

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: 39579
  - SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

**OPERATOR COMMENTS:**

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: 04/02/2025 Email: cchew@kpk.com

<b>COA Type</b>	<b>Description</b>
	<p>Quarterly reporting (90 days) is required under Remediation Project # 39579.</p> <p>Quarterly updates shall include a current map of the subject location including sample and screening locations and current excavation limits/soil stockpiles if applicable. GPS data used to create the map must comply with ECMC Rule 216. Operator will include all analytical data compared to Table 915-1 Standards in table format on each Quarterly updates. Operator shall submit field notes and photo documentation of all field activities reported during a Quarterly Update.</p>
	<p>Pursuant to Rule 912.b.(6) Operator was required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure. The Form 19 Supplemental Report for closure was due by 12/19/2024.</p>
2 COAs	

**ATTACHMENT LIST**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
404131707	SPILL/RELEASE REPORT(SUPPLEMENTAL)
404132108	MAP
404132109	PHOTO DOCUMENTATION
404146521	OTHER
404146522	DISPOSAL MANIFEST
404163400	FORM 19 SUBMITTED
404163405	DENIED FORM 19 DENIED
404165108	FORM 19 DENIED

Total Attach: 8 Files

**General Comments**

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

Total: 0 comment(s)