

State of Colorado
Energy & Carbon Management Commission

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Document Number:

404202330

Date Received:

06/04/2025

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:

Heil, John

Spill/Release Point ID:

489807

OPERATOR INFORMATION

Name of Operator: <u>QB ENERGY OPERATING LLC</u>	Operator No: <u>10844</u>	Phone Numbers
Address: <u>1001 17TH STREET SUITE 1600</u>		Phone: <u>(970) 902-3598</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>(970) 902-3598</u>
Contact Person: <u>Andrew Verbonitz</u>		Email: <u>averbonitz@qb-energy.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# 404159696

Initial Report Date: 04/09/2025 Date of Discovery: 04/09/2025 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR SESE SEC 27 TWP 5S RNG 95W MERIDIAN 6

Latitude: 39.579433 Longitude: -108.033247

Municipality (if within municipal boundaries): _____ County: GARFIELD

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: WELL SITE

Facility/Location ID No 335806

Spill/Release Point Name: P27 16C-27

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): 0

Estimated Condensate Spill Volume(bbl): 0

Estimated Flow Back Fluid Spill Volume(bbl): 0

Estimated Produced Water Spill Volume(bbl): >=1 and <5

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: Clear

Surface Owner: FEE Other(Specify): _____

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

Flowline release was discovered and the line was shut in.

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>
	CPW	Taylor Elm	-	Email
	Garfield County	Kirby Wynn	-	Email
4/9/2025	ECMC	Alex Fischer	-	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: _____

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

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. <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>05/13/2025</u>		
FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	0	<input type="checkbox"/>
CONDENSATE	_____	0	<input type="checkbox"/>
PRODUCED WATER	2	0	<input type="checkbox"/>
DRILLING FLUID	_____	0	<input type="checkbox"/>
FLOW BACK FLUID	_____	0	<input type="checkbox"/>
OTHER E&P WASTE	_____	0	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>YES</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
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) <input 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>0</u>		Width of Impact (feet): <u>0</u>	
Depth of Impact (feet BGS): <u>0</u>		Depth of Impact (inches BGS): _____	
How was extent determined?			
<p>On April 17, 2025, initial site investigation activities to characterize potential soil impacts associated with the release were completed. Prior to investigation activities, the point of release (POR) was exposed using a hydrovacuum truck and the associated flowline was trenched to allow access for repairs. The trench base and sidewalls were field screened for evidence of impacts using visual and olfactory indicators, as well as a photoionization detector (PID). One discrete soil sample was collected from the most impacted area of the excavation, located directly beneath the POR at a depth of approximately 5.5 feet bgs. Additionally, one composite soil sample was collected from the approximate 70 cubic yards of excavated soil stockpiled on site. Field screening PID measurements range from 6.6 to 88.8 parts per million (ppm).</p> <p>Laboratory analysis of the POR soil sample collected beneath the point of release indicates that concentrations of organic constituents are compliant with the Protection of Groundwater Soil Screening Levels (PGSSL), with the exception of the following compounds: benzene (0.15 milligrams per kilogram [mg/kg]), 1,2,4-trimethylbenzene (0.15 mg/kg), 1,3,5-trimethylbenzene (0.36 mg/kg), 1-methylnaphthalene (0.161 mg/kg), 2-methylnaphthalene (0.514 mg/kg), and naphthalene (0.290 mg/kg). Exceedances of metals above PGSSLs include arsenic (22.35 mg/kg), barium (2,062.97 mg/kg), cadmium (0.56 mg/kg), lead (15.32 mg/kg), and selenium (5.41 mg/kg). When evaluated against Residential Soil Screening Levels (RSSL), the sample results were within allowable limits for all constituents except arsenic. All parameters were within the allowable limits for Soil Suitability for Reclamation (SSR) standards. See the attached Report of Work Completed (ROWC) for additional details.</p>			
Soil/Geology Description:			
Lithology at the Location is characterized by poorly-graded gravels with gravel-sand mixtures. Groundwater is expected to flow northwest toward East Fork Parachute Creek and ultimately to the Colorado River, located 9.0 miles south of the Location.			
Depth to Groundwater (feet BGS) <u>70</u>		Number Water Wells within 1/2 mile radius: <u>0</u>	
If less than 1 mile, distance in feet to nearest	Water Well	None <input checked="" type="checkbox"/>	Surface Water <u>300</u> None <input type="checkbox"/>
	Wetlands	None <input checked="" type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>
	Livestock	None <input checked="" type="checkbox"/>	Occupied Building _____ None <input checked="" type="checkbox"/>

Additional Spill Details Not Provided Above:

Historic soil boring data (Oil Shale BG5) collected 640 feet south of the Location indicates depth to groundwater greater than 40 feet bgs. The soil boring was located at an elevation 30 feet below the Location; therefore, depth to groundwater at the Location is estimated to be greater than 70 feet bgs. It is estimated based on hole size at the point of release, SCADA data showing time of release, operational parameters, well production, and well trending data, that approximately 1.89 bbls of produced water were released.

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:

Due to the estimated depth to groundwater of more than 70 feet bgs, a pathway to groundwater does not appear to exist. QB requests to compare analytical results of release investigation to Table 915-1 RSSLs.

Levels of arsenic exceeding Table 915-1 RSSLs remain within the investigation area. Background data collected from the Location indicates these results are within native levels at the Location. Background samples were collected less than 400 feet to the northeast and southeast of the Location, and the elevation difference of collected background samples compared to site investigation samples range from the same relative elevation as the Location to approximately 88 feet above the Location, indicating consistently elevated arsenic levels throughout the area. Background soil samples and the investigation area also share an identical soil type: Rock outcrop-Torriorhents complex with very stony colluvium and alluvium derived from calcareous shale parent material. For these reasons, it is reasonable to conclude that elevated levels of arsenic at the Location are consistent with native conditions. QB requests an alternative allowable limit for arsenic of 36.23 mg/kg, in accordance with Table 915-1 Footnote 11.

Although levels of pH exceeding Table 915-1 SSR were observed within the stockpile sample, source water characterization data collected from the P27 1D-34 wellhead indicates that produced water from the wellhead is not a significant source of basic pH. Analytical results of source water characterization indicate a near-neutral pH value of 6.88; therefore, it is reasonable to conclude that elevated levels of pH are not attributed to oil and gas operations at the Location. Per ECOM Rule 915.e.(2).C., QB requests to remove pH and as a constituent of concern for this release.

Assuming the proposed screening levels, alternative allowable limit, and operator knowledge are approved, all constituents of concern are within Table 915-1 or proposed alternative allowable limits, including the stockpiled material. Based on this information, QB requests closure of Spill/Release Point ID 489807 with a no further action (NFA) determination and request to utilize the compliant material as excavation backfill.

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

Signed: _____ Print Name: Andrew Verbonitz

Title: EHS Rem. Specialist Date: 06/04/2025 Email: averbonitz@qb-energy.com

COA Type

Description

	Based on a review of the information provided, it appears that no further action is necessary at this time and ECOM approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding ECOM standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.
1 COA	

ATTACHMENT LIST

Att Doc Num

Name

404202330	SPILL/RELEASE REPORT(SUPPLEMENTAL)
404202408	LABORATORY ANALYTICAL REPORT

404202409	LABORATORY ANALYTICAL REPORT
404202410	LABORATORY ANALYTICAL REPORT
404202412	LABORATORY ANALYTICAL REPORT
404229377	OTHER
404261502	FORM 19 SUBMITTED

Total Attach: 7 Files

General Comments

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

Total: 0 comment(s)