

Environmental inspection conducted by ECMC EPS Kari Brown and DJ Basin Region Environmental Supervisor Nikki Graber. Any corrective actions from previous inspections that have not been addressed are still applicable. Photos attached to document site conditions.

ECMC staff met representatives of 3rd party operator and KP Kauffman on location to determine the responsible party of a historical spill related to flowline ID 478843 discovered during decommissioning of the adjacent EMERSON-62N67W/29SWNE location (Remediation Project No 35614).

Two flowlines were observed in the open excavations (approximately 6" & 10" diameter). While on location a small pothole was opened adjacent to the flowlines by the third party Operator. Visibly impacted soil was present in the potholed area and removed soil exhibited strong hydrocarbon odors. Per the 3rd party operator, flowline integrity issues were noted in both the pipeline/flowlines during excavation activities, and fluids were present in the larger diameter line.

ECMC records indicate that KPK is the owner of the pipeline/flowline's present in the open excavation and is therefore the responsible party on record of the discovered spill (Facility 9 flowline system; Form 44 Document No 402536813). KPK has indicated that the Facility 9 flowline was purchased from DCP and that this segment of the system was not part of the quit claim; KPK has submitted Form 44 Document No 404269951 (In Process) for this assertion.

ECMC staff walked the mapped line path to the east and west of the spill location and discovered markers and utility locates for both KPK and DCP lines in the area (see attached mapped points). Signs to the east of the spill location indicate KPK operates lines of both 8" and 10" diameter (site photo nos 9 &10), which is consistent with the GIS layer supplied by KPK in Form 44 Document No 402536813.

Operators (KPK & DCP) shall determine who is the appropriate Operator for the lines and submit a Form 19 spill report within 72 hours. If the responsible party cannot be agreed upon within the reporting deadline both parties should submit a Form 19 detailing how the responsible party will be determined. If DCP is determined to be the Operator of the lines DCP shall also submit a Form 44 documenting these changes. Warning Letter Document Nos 404273718 (KPK) and 404273743 (DCP) have been issued.

Note: Fencing was down around open excavation for active work. Fencing was being re-installed around open excavations as ECMC staff was leaving the location. The excavated impacted soil was removed from the location prior to ECMC leaving the location.

Inspected Facilities

Facility ID: 478843 Type: Flowline API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Two flowlines were observed in the open excavations (approximately 6" & 10" diameter). While on location a small pothole was opened adjacent to the flowlines by the third party Operator. Visibly impacted soil was present in the potholed area and removed soil exhibited strong hydrocarbon odors. Per the 3rd party operator, flowline integrity issues were noted in both the pipeline/flowlines during excavation activities, and fluids were present in the larger diameter line.

Corrective Action: Operators (KPK & DCP) shall determine who is the appropriate Operator for the lines and submit a Form 19 spill report within 72 hours. If the responsible party cannot be agreed upon within the reporting deadline both parties should submit a Form 19 detailing how the responsible party will be determined. If DCP is determined to be the Operator of the lines DCP shall also submit a Form 44 documenting these changes. Warning Letter Document Nos 404273718 (KPK) and 404273743 (DCP) have been issued.

Date: 07/13/2025

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
404274155	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7135646
714300185	Mapped Locate Points	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7135644
714300186	Location photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7135645