

State of Colorado
Energy & Carbon Management Commission

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Document Number:

404383970

Date Received:

10/20/2025

Spill report taken by:

Brown, Kari

Spill/Release Point ID:

489547

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>	Phone Numbers
Address: <u>1700 LINCOLN ST STE 4550</u>		Phone: <u>(303) 825-4822</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>		Mobile: <u>(303) 909-0875</u>
Contact Person: <u>DAN MOTISI</u>		Email: <u>dmotisi@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# 404116272

Initial Report Date: 03/05/2025 Date of Discovery: 12/09/2023 Spill Type: Historical Release

Spill/Release Point Location:

QTRQTR NENW SEC 26 TWP 2N RNG 68W MERIDIAN 6

Latitude: 40.115070 Longitude: -104.972812

Municipality (if within municipal boundaries): Frederick 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: WELL Facility/Location ID No 240853

Spill/Release Point Name: Grant 2 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): <u>>0 and <1</u>	Estimated Condensate Spill Volume(bbl): <u>>0 and <1</u>
Estimated Flow Back Fluid Spill Volume(bbl): <u>0</u>	Estimated Produced Water Spill Volume(bbl): <u>>0 and <1</u>
Estimated Other E&P Waste Spill Volume(bbl): <u>0</u>	Estimated Drilling Fluid Spill Volume(bbl): <u>0</u>

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: Not determined.

Surface Owner: FEE Other(Specify): Aqua-Hot Heating Systems, LLC

DENIED

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

During the decommissioning of the Grant 2 wellhead, ten soil samples were collected from the sidewalls/floor from the wellhead & terminating end of the flowline. The samples were field screened using a calibrated PID & all results were observed to be <1 ppm & the samples were submitted for the full Table 915.1 analysis. Visible signs of soil contamination were not present at the time of sample collection. Upon reviewing the laboratory results, TPH at the SW-3 location exceeded Table 915.1. Based on Rule 913.b the release was not reported however, KPK reported these results in doc. 403975614. Based on field screening results & visual observations, KPK believes the SW-3 results were reported in error and has proposed excavating/resampling at that location. Sample locations & proposed soil borings are shown on the attached figures & tables. KPK is closing out this Form 19 (spill ID 489547) & the remainder of the work will continue under an approved Form 27 (Rem ID 32233).

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

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
3/5/2025	Landowner	Aqua-Hot Heating Systems	-	e-mail
3/5/2025	Weld County OEM		-	Website submittal
12/27/2024	ECMC	Kari Brown	720-355-3135	Form 27 submittal

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: n/a Public Water System: n/a
 Residence or Occupied Structure: n/a Livestock: n/a
 Wildlife: n/a Publicly-Maintained Road: n/a

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.

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: 10/13/2025

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

Depth of Impact (feet BGS): _____ Depth of Impact (inches BGS): _____

How was extent determined?

Extents were determined based on visual, field screening and laboratory results.

Soil/Geology Description:

Clayey sands

Depth to Groundwater (feet BGS) 10 Number Water Wells within 1/2 mile radius: 27

If less than 1 mile, distance in feet to nearest

Water Well	<u>494</u>	None <input type="checkbox"/>	Surface Water	<u>981</u>	None <input type="checkbox"/>
Wetlands	<u>849</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	_____	None <input checked="" type="checkbox"/>	Occupied Building	<u>209</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Potential Receptors within a mile
100 year floodplain 488' to east
No HPH,
Riverine 849' to the east
Miller drive 106' to the east
Occupied bld 209' to the south,
Goding Hollow parkway 659' to the north
Johnson Drive 792' to the west
I-25 1,940' feet to the west
Commerce Drive 1,206' to the south

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 10/13/2025

Root Cause of Spill/Release Unknown (Historical)

Other (specify) _____

Type of Equipment at Point of Spill/Release: Wellhead Line

If "Other" selected above, specify or describe here:

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

This is an historical release and no signs of equipment failure were observed during decommissioning.

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

This is an historical release.

Volume of Soil Excavated (cubic yards): 0

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: 32233

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

OPERATOR COMMENTS:

City of Frederick was notified on 10/10/25. See attached correspondence.

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

Signed: _____ Print Name: DAN MOTISI

Title: Environmental Geologist Date: 10/20/2025 Email: dmotisi@kpk.com

COA Type	Description
0 COA	

ATTACHMENT LIST

Att Doc Num	Name
404383970	FORM 19 DENIED
404388664	ANALYTICAL DATA SUMMARY TABLE(S)
404388723	MAP
404388774	ANALYTICAL RESULTS
404397331	CORRESPONDENCE
404397336	OTHER
404398057	FORM 19 SUBMITTED

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
Environmental	<p>This form is denied because one or more of the attached laboratory analytical reports is not secured; Document # 404388774 contains metadata not consistent with similar laboratory reports. Operator shall resubmit the Form 19 and ensure all laboratory reports are secured and contain metadata appropriate to document any differences in created and modified dates, and/or the laboratory analytical report shall be signed with a validated signature certificate.</p> <p>The secure laboratory requirements are outlined in the Tuesday, April 8, 2025 notice to Operators and was covered in an Operator meeting that same day.</p>	10/20/2025
Environmental	<p>Operator has selected 'Yes' to 'Was spill/release completely contained within berms or secondary containment?' Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs. The Spill has not been contained and has impacted soil.</p> <p>Operator shall select 'No' to 'Was spill/release completely contained within berms or secondary containment?' on the replacement Form 19 — Supplemental.</p>	10/20/2025
Environmental	<p>Multiple indications of livestock within 1 mile of the location are visible in aerial imagery. Operator shall update the sensitive receptor distances to include this information on the replacement Form 19 — Supplemental.</p>	10/20/2025
Environmental	<p>Operator shall populate the length, width and depth of impacted media under the Spill/Release Detail Report with estimated values based on the initial investigation on the replacement Form 19 — Supplemental.</p>	10/20/2025
Environmental	<p>The Supplemental Report for this spill/release was not submitted within 10 days of discovery of the spill/release as required by Rule 912.b.(4), or within 10 days of the Initial Report Date.</p> <p>The Supplemental Report requesting closure for this spill/release was not submitted within 90 days of discovery of the spill/release as required by Rule 912.b.(6), or within 90 days of the Initial Report Date.</p> <p>Operator will provide explanation for late reports on the replacement Form 19 — Supplemental including actions implemented to prevent late reporting in the future.</p>	10/20/2025

Environmental	ECMC notes that local government (Town of Fredrick) was notified of the spill/release on 10/10/2025, 653 days after the spill/release was discovered. Operator will provide explanation for notifications on the replacement Form 19 — Supplemental including actions implemented to prevent late notifications in the future.	10/20/2025
Environmental	Attached figures (Document # 404388723) include sampling plans along the associated flowline. Flowline sampling plans are not relevant to the scope of Spill ID 489547. Operator shall refrain from providing irrelevant attachments with future submissions under the subject Spill.	10/20/2025
Environmental	Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.	10/20/2025
Environmental	Quarterly reporting (90 days) is required under Remediation Project # 32233. Operator is past due on quarterly reporting. The last Form 27 was received on 12/27/2024 (Document # 403975614). Operator shall submit a Supplemental Form 27 for this project within 10 days. Operator is out of compliance with Rule 913.e.(3).	10/20/2025
Environmental	All ongoing/unaddressed comments/COAs from previous Forms remain applicable.	10/20/2025

Total: 10 comment(s)

DENIED