

Site Name Grant 2
 Facility ID 240853
 Spill/Release ID
 Remediation # 32233

Document Date	Document #	Document Type	Condition of Approval (COA)	Corrective Action (CA)	Status	Date Resolved	Resolved Doc #
11/28/2023	403607987	Form 27	Per COAs on Initial Document #403456890 Operator will provide notice to COGCC EPS at least 72 hours prior to any sampling events performed on location.	Acknowledged	on-going		404383970
11/28/2023	403607987	Form 27	Approval of this Form 27 does not imply approval of pre-abandonment in place notice required by Rule 1105.d.(2). On the Form 27 Supplemental Report, include Form 44 Flowline Report document number that contains pressure test results required by Rules 1105.e.(6) and 1105.f.(2)C.	Form 44 pre-abandonment notice (403397848) will be submitted. Final Form 44 and pressure test will be submitted in a subsequent Form 27	on-going		
11/28/2023	403607987	Form 27	Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 50' along the abandonment in place section and collect samples for confirmation at the following locations: - on both sides where the line crosses the NWI wetland/Godding Hollow Creek -where the line changes course from N to NE These samples can be obtained by a hand auger boring.		on-going		
11/28/2023	403607987	Form 27	Per COAs on Initial Document #403456890 and Operator meeting on 2/14/2023 Operator shall collect ALL 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)).		Acknowledged		404383970
3/14/2025	404116272	Form 19	Operator did not report if local government (town of Fredrick) was notified as required by Rule 912.b.(2).B. Operator shall submit documentation of notification with the next Supplemental Form 19.	City of Frederick was notified on Octob. 10, 2025.	Complete		404383970
3/14/2025	404116272	Form 19	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		404383970
3/14/2025	404116272	Form 19	Re-samples/verification samples of organic exceedances are not considered valid. Operator shall remediate soils in the vicinity of impacts.	Per Doc 404116272 KPK has proposed excavating and resampling at the SW-2 location	Acknowledged		404383970
3/14/2025	404116272	Form 19	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: A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill 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 C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator 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.		Acknowledged		404383970
3/14/2025	404116272	Form 19	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)).		Acknowledged		404383970
3/14/2025	404116272	Form 19	ECMC believes this spill was reportable on 12/27/2023 when Operator received results of soil samples showing TPH exceedances for samples collected 12/5/2023 under 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. Operator failed to submit the Initial Spill Report in compliance with Rule 912.b. On the next Form 19 Supplemental Operator will provide actions implemented to prevent late reporting in the future.		Acknowledged		404383970
10/20/2025	404383970	Form 19	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. Operator shall select "No" to "Was spill/release completely contained within berms or secondary containment?" on the replacement Form 19 — Supplemental.	Updated	Complete		404398887
10/20/2025	404383970	Form 19	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.	Updated	Complete		404398887
10/20/2025	404383970	Form 19	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.	Updated	Complete		404398887
10/20/2025	404383970	Form 19	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. 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. Operator will provide explanation for late reports on the replacement Form 19 — Supplemental including actions implemented to prevent late reporting in the future.	Operator fully intends to provide timely submittals. Due to unforeseen circumstances some submittals may be late.	Complete		404398887
10/20/2025	404383970	Form 19	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.	See attached correspondence	Complete		404398887
10/20/2025	404398887	Form 19	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.	Operator has removed the irrelevant figures from this form.	Complete		404398887
10/20/2025	404398887		Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.	Manifests attached	Complete		404398887
10/20/2025	404398887		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).	Operator fully intends to provide timely submittals. Due to unforeseen circumstances some submittals may be late.	Acknowledged		404398887