

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

404443027

Date Received:

11/20/2025

Spill report taken by:

Rollins, Grace

Spill/Release Point ID:

492280

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>(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# 404440276

Initial Report Date: 11/18/2025 Date of Discovery: 11/18/2025 Spill Type: Historical Release

Spill/Release Point Location:

QTRQTR SENE SEC 36 TWP 2N RNG 68W MERIDIAN 6

Latitude: 40.096881 Longitude: -104.944584

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 _____

Spill/Release Point Name: State 14 Historical Well API No. (Only if the reference facility is well) 05-123-09466

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: CROP LAND

Other(Specify): _____

Weather Condition: 62 DEGREES, CLOUDY

Surface Owner: FEE

Other(Specify): Frederick Investment Company

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

KPK is reporting a historical release discovered during P&A operations for the cut and cap of the State 14 wellhead on 11/18/2025. KPK crews encountered historical contamination at the wellhead during excavation. KPK responded immediately by beginning the removal of contaminated soil. The line had already been shut in for P&A removal of the wellhead and flowline. KPK will continue excavating the remaining contaminated soil, field screen soil locations, then collect confirmation samples to be analyzed for full Table 915-1 constituents.

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>
11/18/2025	Frederick Investment Company	Jon Lee	-	via phone and email
11/18/2025	Town of Frederick	Robert Aronoff	-	via email
11/18/2025	ECMC	Kari Brown	-	via email
11/18/2025	ECMC	Nikki Graber	-	via 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.

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: 11/20/2025

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): 14 Width of Impact (feet): 9

Depth of Impact (feet BGS): 9 Depth of Impact (inches BGS): _____

How was extent determined?

Extent will be determined via field screening and analytical sampling of soil. The current extent was determined via visible subsurface soil staining.

Soil/Geology Description:

OH

Depth to Groundwater (feet BGS) 12 Number Water Wells within 1/2 mile radius: 15

If less than 1 mile, distance in feet to nearest

Water Well	<u>985</u>	None <input type="checkbox"/>	Surface Water	<u>959</u>	None <input type="checkbox"/>
Wetlands	<u>1118</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	_____	None <input checked="" type="checkbox"/>	Occupied Building	<u>929</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Distances to receptors are as follows:
Water well: located approximately 985' northeast of well
Surface water: unnamed pond located approximately 959' north of well
Wetlands: freshwater emergent wetland located approximately 1118' southeast of well
School: track located approximately 912' north of well
Occupied building: located approximately 929' east of well
100 year floodplain buffer: located approximately 777' east of well
No HPH in area.

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 11/20/2025

Root Cause of Spill/Release Unknown (Historical)

Other (specify)

Type of Equipment at Point of Spill/Release: Other

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

wellhead

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

This is considered a historical release since there is wide spread soil contamination. The root cause is unknown and is not associated with a single release.

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

This site is being decommissioned. The wellhead is in the process of being cut and capped.

Volume of Soil Excavated (cubic yards): 23

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: _____
 - 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: 11/20/2025 Email: cchew@kpk.com

COA Type**Description**

	<p>Per the COA on Form 19 Document # 404440276: "Per Rule 911.a.(1), Operators was required to obtain the Director's approval of the Form 27 prior to conducting any investigation or closure operations. Operator was not granted approval prior to Operator conducting investigation or closure operations, violating Rule 911.a.(1).</p> <p>Approval of this Form 19 shall not be construed as approval of the Form 27 and this matter has been referred to enforcement. Operator shall cease addition investigation or closure operations and backfill with clean imported material. Operator may proceed only after the Form 27 is approved."</p> <p>Operator shall provide documentation confirming that this COA has been addressed on the next Form 19 — Supplemental Report.</p>
	The nearest wetlands (Riverine) is 863 ft east of the location, as mapped on the National Wetland Inventory Maps. Operator shall update the sensitive receptor distances to include this information on the subsequent Form 19.
	<p>Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director.</p> <p>Form 19 Supplemental requesting closure is due by February 16, 2026.</p>
	All ongoing/unaddressed comments/COAs from previous Forms remain applicable.
4 COAs	

ATTACHMENT LIST**Att Doc Num****Name**

404443027	SPILL/RELEASE REPORT(SUPPLEMENTAL)
404444614	MAP
404444621	PHOTO DOCUMENTATION
404444633	DISPOSAL MANIFEST
404484160	FORM 19 SUBMITTED

Total Attach: 5 Files

General Comments**User Group****Comment****Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)