

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:

404398887

Date Received:

12/02/2025

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>()</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: -104.967660

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): >0 and <1 Estimated Condensate Spill Volume(bbl): >0 and <1

Estimated Flow Back Fluid Spill Volume(bbl): 0 Estimated Produced Water Spill Volume(bbl): >0 and <1

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? No

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 of 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 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 the 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 & collecting additional samples at that location. Sample locations & proposed soil borings are shown on the attached figures. 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: 10/21/2025

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? 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): 12 Width of Impact (feet): 9

Depth of Impact (feet BGS): 6 Depth of Impact (inches BGS): _____

How was extent determined?

Extents were determined based on visual, field screening and laboratory results as previously reported in approved Form 19 (doc# 403975614).

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	<u>5280</u>	None <input 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
Livestock: McDonald farms located 2865' southwest

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 10/21/2025

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): 576

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:

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: 12/02/2025 Email: dmotisi@kpk.com

COA Type

Description

0 COA

ATTACHMENT LIST

Att Doc Num	Name
404398887	FORM 19 DENIED
404424168	DISPOSAL MANIFEST
404436757	MAP
404455550	CORRESPONDENCE
404456033	OTHER
404484189	FORM 19 SUBMITTED

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	ECMC has denied the subject Form and request for closure due to inadequate reporting. Multiple comments/COAs from previous Forms remain unaddressed. Operator is directed to submit a replacement Form 19 as soon as practicable but within 48 hours (by 12/24/2025).	12/22/2025
Environmental	Per the comment on Form 19 Document # 404383970: "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. 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." No laboratory analytical reports have been attached to the subject Form. This comment remains applicable and outstanding.	12/22/2025
Environmental	Per the comment on Form 19 Document # 404383970: "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." Operator has reported that the nearest livestock is 5280 ft of the location. The nearest indication of livestock is approximately 2380 ft northeast of the location, as visible in aerial imagery. Operator shall update the sensitive receptor distances to include this information on the subsequent Form 19.	12/22/2025
Environmental	Per the comments on Form 19 Document # 404383970, Operator was required to provide explanations for late reporting on the replacement Form 19 — Supplemental including actions implemented to prevent late reporting in the future. No explanations for late reporting have been provided within the subject Form. This comment remains applicable and outstanding.	12/22/2025

Environmental	<p>Per the comment on Form 19 Document # 404383970: "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)."</p> <p>An updated Form 27 has not been received under Remediation Project # 32233. This comment remains applicable and outstanding. Spill/Release Point ID 489547 will remain unresolved until a Supplemental Form 27 with a proposed workplan and timeline for remediation of this Release is submitted under Remediation Project # 32233.</p>	12/22/2025
Environmental	<p>Operator has reported that approximately 576 cubic yards of impacted soil have been excavated for offsite disposal. The attached waste manifests (Document # 404424168) indicate that approximately 76 tons of impacted soil have been transported offsite for disposal. Based on unit conversions with respect to the reported lithology (clayey sands, 1.35 tons/yd³), ECMC estimates the volume of excavated soil to be approximately 56 cubic yards. Operator shall correct this approximation or provide additional documentation (waste manifests) on the next Form 19 — Supplemental Report.</p>	12/22/2025

Total: 6 comment(s)

DENIED