

State of Colorado  
Energy & Carbon Management Commission

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Document Number:

404590498

Date Received:

03/23/2026

Spill report taken by:

Maclaren, Joe

Spill/Release Point ID:

493604

**SPILL/RELEASE REPORT (INITIAL /w 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>	<b>Phone Numbers</b>
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# 404590498

Initial Report Date: 03/23/2026 Date of Discovery: 03/20/2026 Spill Type: Historical Release

**Spill/Release Point Location:**

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

Latitude: 40.094074 Longitude: -104.953871

Municipality (if within municipal boundaries): \_\_\_\_\_ 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: OFF-LOCATION FLOWLINE  Facility/Location ID No 476255

Spill/Release Point Name: State 14 Flowline Historical  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): Unknown Estimated Condensate Spill Volume(bbl): Unknown

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: NON-CROP LAND Other(Specify): \_\_\_\_\_

Weather Condition: sunny, 85 degrees

Surface Owner: FEE Other(Specify): CDG Colorado

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

KPK discovered a historical release while completing soil field screening for the decommissioning of the State 14 wellhead and flowline within the flowline trench. Field screening equipment indicated organic exceedances within the flowline at 4' depth. The flowline has been removed at this time and the trench remains open.

**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>
3/20/2026	Weld County OEM	online webform	-	online webform
3/23/2026	Town of Frederick	Robert Aronoff	-	via email
3/20/2026	CDG Colorado - Landowner Rep.	Travis Young	-	via email
3/20/2026	ECMC	Kari Brown	-	via email
3/20/2026	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: 03/23/2026

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	_____	_____	<input checked="" 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): 100 Width of Impact (feet): 1

Depth of Impact (feet BGS): 4 Depth of Impact (inches BGS): \_\_\_\_\_

How was extent determined?

Via field screening of soil within the trench

Soil/Geology Description:

nunn loam, 1 to 3 percent slopes

Depth to Groundwater (feet BGS) 20 Number Water Wells within 1/2 mile radius: 0

If less than 1 mile, distance in feet to nearest

Water Well	<u>3089</u>	None <input type="checkbox"/>	Surface Water	<u>1132</u>	None <input type="checkbox"/>
Wetlands	<u>2970</u>	None <input type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	_____	None <input checked="" type="checkbox"/>	Occupied Building	<u>715</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Distances to receptors are as follows:  
Water well: located approximately 3089' southwest of release  
Surface water: unnamed pond located approximately 1132' northeast of release  
Wetlands: Sullivan Ditch riverine wetland located approximately 2970' west of release  
Livestock: none in area  
Occupied building: residential homes located approximately 715' south of release  
No HPH in area.

### CORRECTIVE ACTIONS

#1 Supplemental Report Date: 03/23/2026

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:

off location flowline

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. Stained soil was not observed but an odor was present.

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

The flowline has been removed from location.

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: \_\_\_\_\_
  - 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: 03/23/2026 Email: cchew@kpk.com

**COA Type****Description**

	<p>Per Rule 911.a.(1), Operator was required to obtain the Director's approval of the Form 27 prior to conducting any investigation or closure operations.</p> <p>Operator was not granted approval prior to Operator conducting investigation or closure operations, violating Rule 911.a.(1). 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>Duplicative Initial Form 27 Document Nos. 404354917 and 404356743 proposing a site investigation for the plugging and abandonment of the STATE #14 well and removal of the associated flowline have been submitted. The Initial Forms 27 have not been approved, and the following comment has been applied by ECMC:  "ECMC has moved this form to ON HOLD without technical review as Operator is substantially out of compliance with Rule 913 for their remediation projects. ECMC will not begin processing Form 27 Initials associated with Rule 911 Facility Decommissioning until Operator has met the following criteria:  Operator has submitted approvable Form 27 Supplementals for at least 75% of their outstanding remediation projects. Form 27 Supplementals must provide all outstanding information for the project, including addressing outstanding COAs, as well as a remediation plan with implementation schedule driving the project towards closure, and;  Operator has closed all Spills older than 90 days in accordance with Rule 912.b.(6)."</p> <p>This matter has been referred to Enforcement.</p>
	<p>On 12/02/2025, ECMC Staff conducted an inspection (Document No. 717100432) of the associated STATE #14 well in response to Spill/Release Point ID 492280. Per the Corrective Actions on that Field Inspection Report:  "Operator shall cease additional investigation or closure operations and backfill with clean imported material. Operator may proceed only after the Form 27 is approved. CA due date is backlisted to the date of spill/release discovery.</p> <p>Operator will provide notice to ECMC DJ Basin Environmental Supervisor Nikki Graber and to ECMC Area EPSs Kari Brown and Laurel Anderson via email at least 72 hours prior to any sampling events performed on location. Email notification must include the scope of work, start date and time, and contact information for the on site contact."</p> <p>Operator has failed to comply with this Corrective Action. The required notice was not provided. The above referenced requirements remain applicable and outstanding.</p>
	<p>Operator has reported that they encountered impacted soils during the onsite excavation activities. These soils are required to be treated as Investigation-Derived Waste in accordance with 913.b.3. and must be stored, handled, transported, treated, recycled, or disposed of in accordance with ECMC rules. More specifically these soils are not allowed to be placed back into the excavation to prevent adverse environmental impacts.</p> <p>Due to the sensitive nature of this location (residential area, close proximity to school), E&amp;P waste storage in stockpiles is not acceptable.</p> <p>Operator shall implement, continuously monitor and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECMC Guidance 913.b. (5)B i-v which requires fencing used be appropriate to site.</p>
	<p>Operator shall provide all waste manifests as required by Rule 905.b.(3) for oily waste hauled off site for disposal.</p>
	<p>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)).</p>
	<p>The nearest wetlands (Riverine) are ~2644 ft southwest of the location, as mapped on the National Wetland Inventory Maps. Operator shall update the sensitive receptor distances to include this information on the next Form 19 — Supplemental.</p>

	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.
	All ongoing/unaddressed comments/COAs/CAs from previous Forms and Field Inspection Reports remain applicable.
8 COAs	

**ATTACHMENT LIST**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
404590498	SPILL/RELEASE REPORT(I/S)
404590711	MAP
404593212	FORM 19 SUBMITTED

Total Attach: 3 Files

**General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Engineering Tech	Reported historical release; document available information regarding the root cause of flowline failure leading to historical release and measures to be taken by operator to prevent a recurrence of failure on active flowlines (CA section of ECMC I/S form 19)	03/24/2026
Environmental	ECMC has corrected the subject Form to reference Facility ID 476255 (Off-Location Flowline associated with the State #14 well). Operator erroneously referenced Facility ID 333158 (Location associated with the State #14 well).	03/23/2026

Total: 2 comment(s)