

None of the requirements defined in Rule 912.b.(1) are applicable to this release; therefore, no Form 19 is required, explanation with rule citations below:

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.

No Waters of the State, Public Water System, Residence or occupied structure, livestock, or publicly maintained road was threatened by this spill. The Spill was entirely inside secondary containment on the surface.

Nearest Occupied Structure: 860 Ft

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; _ 900-28 As of January 15, 2021

Release was inside Secondary Containment

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.

Release was under 5 Barrels inside secondary containment.

Per KPK calculations:

Approx. 250 Sq Ft x 2'' depth infiltration = 1.54 Cubic Yards of Impacted Material

*1.54 Cubic Yards of material assuming 20% porosity equates to 62.2 Gallons or **1.44 Barrels**.*

If COGCC Guidance of High Retention Factor instead of Saturated pore space and estimated porosity from guidance is calculated:

*1.54 Yards of Impacted Material x 0.2 High Retention Factor x 0.35 Pore space = **0.51 Barrels***

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.

Not Applicable

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.

1.54 yards of impacted Material is calculated in this Spill. KPK will note that with over excavation the Manifest shows 24 yards of total material removed.

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.

Not Applicable.

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.

Volume was calculated to be 1.54 Cubic yards and between 0.54 and 1.44 barrels

H. A 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.

Not Applicable.

I. A Release of natural gas that results in an accumulation of soil gas or gas seeps.

Not Applicable

J. A Release that results in natural gas in Groundwater.

Not Applicable