FORM 19 Rev 03/21

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: 403816522
Date Received: 06/21/2024

Spill report taken by: Anderson, Laurel

Spill/Release Point ID: 485956

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 INFORMATON

Name of Operator: KP KAUFFMAN COMPANY INC Operator No: 46290

Address: 1700 LINCOLN ST STE 4550

City: DENVER State: CO Zip: 80203

Contact Person: John Peterson

Phone Numbers

Phone: (720) 8689848x0110

Mobile: (303) 5508872

Email: jpeterson@kpk.com

☐ 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# 403668567

Initial Report Date: 01/28/2024 Date of Discovery: 01/26/2024 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR NESE SEC 2 TWP 1N RNG 67W MERIDIAN 6

Latitude: 40.076797 Longitude: -104.848633

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 478839

Spill/Release Point Name: Facility 8 @ Pehr 12-1

☐ 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): >=5 and <100

Estimated Condensate Spill Volume(bbl): 0

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? Yes

Land Use:

Current Land Use: OTHER Other(Specify): Active tank battery and CR23

Weather Condition: 45 degrees F, partly cloudy

Surface Owner: FEE Other(Specify): The Pehr Land Trust

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

Xcel Damage Prevention employee contacted KPK about the spill on 1.26.24. KPK personnel immediately went to the site, shut in the wellheads, and isolated the flowline. KPK mobilized a vac truck to evacuate the flowline. The Hydro-Vac removed fluids/stained soil for offsite disposal. The spill is located between the Kerr McGee Pehr Pooling Unit 1 battery and CR 23. KPK installed a snow fence around the spill. Surface staining was approximately 72 ft2 (6'x12'). See attached pictures.

The spill occurred approximately 20 ft east of CR 23 and roughly 0.2 miles south of Highway 52. Cropland is east of the Kerr McGee battery. KPK notified Weld County, the landowner, and ECMC of the spill. KPK will provide notice to ECMC at least 48 hours prior to excavation backfill, soil boring/monitoring well installation, or any sampling events.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
1/26/2024	Weld County	online webform	-	via online OEM website
1/26/2024	ECMC	N. Graber/L. Anderson	-	via email
1/26/2024	Landowner	Pehr Land Trust	303-857-2221	via email

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

Yes — 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: Impacted

Public Water System: n/a

Residence or Occupied Structure: n/a

Livestock: n/a

Wildlife: n/a

Publicly-Maintained Road: Threatened to Impact

Yes — 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? _____

Yes — 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.): 200

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 daylights 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: 06/21/2024

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	15	4	☐
CONDENSATE	0	0	☐
PRODUCED WATER	1	1	☒
DRILLING FLUID	0	0	☐
FLOW BACK FLUID	0	0	☐
OTHER E&P WASTE	0	0	☐

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): 30 Width of Impact (feet): 14

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

How was extent determined?

Extent is not yet fully determined. KPK has scraped the oily waste from the surface and excavation of contaminated soil beneath the surface is ongoing. KPK plans to collect samples from the excavation sidewalls and submit the samples for laboratory analysis under full Table 915-1. See attached figures.

Soil/Geology Description:

Silty Loam

Depth to Groundwater (feet BGS) 6 Number Water Wells within 1/2 mile radius: 25

If less than 1 mile, distance in feet to nearest

Water Well	675	None ☐	Surface Water	475	None ☐
Wetlands	565	None ☐	Springs		None ☒
Livestock	689	None ☐	Occupied Building	580	None ☐

Additional Spill Details Not Provided Above:

Distance to potential receptors is as follows:
Water well: approximately 611 feet northeast of spill.
Surface water: unnamed pond located approximately 475 feet northeast of spill.
Wetlands: riverine wetland located approximately 565 feet east of the spill.
Livestock: approximately approximately 689 feet northeast of spill.
Occupied building: approximately 580 feet southeast of spill.
100 year floodplain: approximately 2700 feet east of spill.
High priority habitat: Mule deer migration corridor located approximately 2630 feet east of spill.

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 06/13/2024

Root Cause of Spill/Release: Corrosion

Other (specify):

Type of Equipment at Point of Spill/Release: Other

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

Flowline

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

The root cause of failure to the flowline is internal corrosion at the 6 o'clock position of the 10" steel line near a valve set. There are many causes of corrosion in buried steel lines including (but not limited to): age; insulation failure; low pH; hard water; water temperature; microorganisms; chemical and electrochemical reactions; soil type and quality; chlorides; pressure; and/or oxygenated water. In most cases of both internal and external corrosion, more than one of these factors contribute. Every site has the potential for a different combination of contributing factors. In the case of KPKs flowlines and consolidated flowlines, the most common contributing factors are age, hard water, chemical and electrochemical reactions; microbial conditions, chlorides, and insulation failure. Determining specific causes of corrosion at a single site requires many chemical and physical parameter investigations and testing. It is not practical nor appropriate to conduct such investigations at every release site, especially when KPKs preventive measures employed following the identification of a corrosion root cause eliminates corrosion as a future potential.

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

The steel flowline was stung with 1400' of 4" poly pipe running north of the excavation to Facility 8 and 1300' south of the excavation to a valve set. KPK is systematically replacing steel flowlines with poly pipe to eliminate future corrosion of the flowline throughout the field. Poly pipe does not corrode and is compatible with the materials KPK produces. This flowline replacement occurs at the leak point and typically goes in both directions of the flowline for many hundreds of feet to the closest section of existing plastic pipe for connection. KPK slips this poly pipe inside the existing steel flowline to provide additional benefits/functionality going forward such as: secondary containment; protection from physical damage by subsequent subsurface digging; and provide the ability to use magnetic locating equipment to identify the flowline location. KPK has developed and submitted a comprehensive Flowline Integrity Management Plan in collaboration and multiple reviews/edits with the ECMC Flowline Integrity Group (attached herein). KPK follows this plan to maintain flowline integrity and employs flowline replacement as the primary preventative measure. For risk mitigation and the elimination of threats to flowline integrity, KPK refers to API Recommended Practice 1160, Section 10. KPK also contracted Multi-Chem® to conduct an analysis of chemical contributors to corrosion on steel flowlines. The recommendation going forward was to inject a biocide in the separator for sites with steel flowlines to mitigate microbial corrosive action where microbial activity may be a contributing factor. KPK employs this biocide application procedure on a site by site basis at locations where pipeline replacement using HDPE is not possible.

Volume of Soil Excavated (cubic yards): 125

Disposition of Excavated Soil (attach documentation) ☒ Offsite Disposal ☐ Onsite Treatment ☐ Other (specify)

Volume of Impacted Ground Water Removed (bbls): 126

Volume of Impacted Surface Water Removed (bbls): 0

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.
- [X] Work proceeding under an approved Form 27 (Rule 912.c).
  - Form 27 Remediation Project No: 35566
- [ ] 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: 06/21/2024 Email: cchew@kpk.com

COA Type	Description

0 COA

ATTACHMENT LIST

Att Doc Num	Name
403824492	OTHER
403824494	OTHER
403829945	DISPOSAL MANIFEST
403831392	MAP
403832001	DISPOSAL MANIFEST
403832358	OTHER
403832360	PHOTO DOCUMENTATION

Total Attach: 7 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)