

April 12, 2021

KP Kauffman Company Inc. Attn: Ross Watzman 1675 Broadway, Ste. 2800 Denver, CO 80202

#### DIRECTOR'S ORDER PURSUANT TO RULE 901.a.

This Order is issued by the Director of the Colorado Oil and Gas Conservation Commission ("COGCC" or "Commission") pursuant to Rule 901.a. of the Rules and Regulations of the Colorado Oil and Gas Conservation Commission, 2 CCR 404-1 ("Rule" or "Rules").

#### INTRODUCTION

1. KP Kauffman Company Inc. (Operator No. 46290) ("KPK") is the operator of numerous oil and gas facilities, including the Locations described in Exhibit A, which are located in Weld and Adams Counties. A map showing these Locations is included as Exhibit B.

2. As of April 1, 2021, KPK has 29 active spill/release Locations related to 87 oil and gas wells in the Greater Wattenberg Area ("GWA"),<sup>1</sup> further described in Exhibit A,<sup>2</sup> that require immediate attention to protect public health, safety, welfare, the environment, and wildlife resources.

3. To date, KPK has not taken the steps necessary to avoid, minimize, or mitigate the potential impacts to public health, safety, welfare, the environment, or wildlife resources at these Locations as requested by Staff and required by the Rules.

4. The Director has reasonably ascertained the underlying facts on which this action is based.

5. Therefore, the Director has objective grounds and reasonable cause to determine that KPK, in the conduct of oil and gas operations, is impacting or threatening to impact public



<sup>&</sup>lt;sup>1</sup> Rule 402 defines the GWA as those lands from and including Townships 2 South to 7 North and Ranges 61 West to 69 West, 6th P.M. More generally, the GWA is an area in the Northeast corner of Colorado where urban and suburban development exists alongside significant oil and gas activities. The GWA includes portions of Weld County where approximately 38% of all active wells in the state are located.

<sup>&</sup>lt;sup>2</sup> Exhibit A is focused on KPK's spill/release locations where the greatest threat to human receptors exists. This list does not include all of their spill/release locations at other KPK operations outside of the GWA.

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health, safety, welfare, the environment, and wildlife resources. The Director finds that KPK's inactions imperatively require immediate action and the Director enters this Order requiring KPK to immediately initiate mitigation measures at the 29 active spill/release Locations and immediately suspend production operations at all 87 oil and gas wells described in Exhibit A.

#### BACKGROUND

6. Since January 1, 2015 through March 30, 2021, KPK has reported approximately 85 spills/releases and opened approximately 73 remediation projects statewide.

7. Since 2018, KPK has been responsible for numerous spills and releases in the GWA, including the 29 spill/release Locations described in Exhibit A. The GWA, more than other producing regions in the state, has a greater density of oil and gas activities that are close to human receptors, including homes, businesses, schools, and roads.

8. Many of the spills and releases described in Exhibit A are very serious and demand immediate attention and resources to minimize ongoing impacts to public health, safety, welfare, the environment, and wildlife resources. To date, KPK has been unable, or unwilling, to commit the attention and resources that are required to adequately address these matters. Standard industry practices could have been used to stabilize, mitigate, or, in some cases, completely remediate the spills and releases described in Exhibit A, which would eliminate ongoing risk to public health, safety, welfare, the environment, and wildlife resources.

9. A significant number of the spills and releases described in Exhibit A have occurred from flowline failures. KPK's practice has been to shut in the line and send a crew to the impacted location to excavate and expose the line for repairs. During this response, the crew's focus is to repair the flowline so KPK can resume production. KPK will then put the repaired line back into service but will fail to follow-up by performing additional spill cleanup or delineation. Stockpiles of oily waste are often improperly maintained without appropriate storm-water controls and excavations are frequently left open for months without proper fencing to prevent access to affected areas — presenting a threat to public health, safety, welfare, the environment, and wildlife resources. In many cases after the line is repaired, KPK does not monitor the locations to maintain storm-water best management practices or fencing, if any. In at least two instances, free product has accumulated in open excavations and KPK has taken no action to remove the liquids after corrective actions set forth in COGCC field inspection reports required them to do so. At some of KPK's Locations, the flowline has failed a second time, resulting in additional impacts.

10. Another serious issue includes the improper management of exploration and production ("E&P") waste at two tank battery remediation projects identified in Exhibit A which represents a threat to public health, safety, welfare, the environment, or wildlife resources. At these two projects, the only produced water vessels on these Locations have either been removed or have known integrity issues. However, the related wells are listed as producing and KPK has not provided the documentation required by Rule to verify that produced water is being properly stored and disposed of at these Locations.

11. COGCC Rules require operators to investigate, clean up, and document impacts

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resulting from spills and releases as soon as the impacts are discovered. However, KPK has repeatedly failed to comply with this basic requirement regarding spills, releases, and remediation. This practice is evident in the spills and releases described in Exhibit A. For example, there are 14 matters where remediation has lingered for longer than six months and, in four of those cases, longer than two years despite the presence of sensitive receptors nearby these Locations. More significant than the overall duration of remediation is the failure to remove contaminated source material during the initial responses, which failure allows contaminants to continue to migrate and potentially compound impacts. KPK has indicated on several first quarter 2021 Form 27, Site Investigation and Remediation Workplan, submissions that it has taken no action to perform any additional assessment or remediation to mitigate ongoing impacts due to a lack of resources. KPK's failure to perform the required work due to an alleged lack of resources is not acceptable and presents an ongoing threat to protect public health, safety, welfare, the environment, and wildlife resources.

12. In addition, COGCC Rules require operators to provide verbal or written notification of spills and releases to both local governments and surface owners. In many cases, KPK has not provided the required notification in compliance with COGCC Rules, making it harder for COGCC to properly oversee these matters. Instead, third parties, such as private surface owners or local government personnel, have notified COGCC or KPK of spills or releases related to KPK's facilities. In some instances, a spill or release has been reported through complaints filed with COGCC against KPK. Across the industry in Colorado, this is very unusual. In COGCC's experience, oil & gas operators in the state usually find and report their own spills to COGCC before surface owners or third parties do.

13. KPK has failed to perform the required follow-up to remove additional source material or perform additional delineation to determine the complete extent of the impacts at most of the Locations described in Exhibit A. This presents an ongoing threat to the environment until delineation and remediation is completed at each affected Location. KPK consistently attempts to excuse their lack of follow-up as the result of broken down equipment or lack of resources.

14. All of the spills and releases listed in Exhibit A pose an ongoing threat to groundwater, and in some cases there is a known impact to groundwater in violation of Colorado Department of Public Health and Environment, Water Quality Control Commission ("WQCC"), Regulation 41, *The Basic Standards for Ground Water*, 5 C.C.R. § 1002-41. COGCC is an implementing agency for water quality standards and classifications adopted by WQCC for groundwater protection.

15. Since January 1, 2015, COGCC has issued numerous inspection reports and at least 19 NOAVs (Statewide) to KPK.

16. Following a full investigation of the matters summarized in Exhibit A, the Director has objective grounds and reasonable cause to determine that KPK, in the conduct of Oil and Gas Operations, is impacting and threatening to impact public health, safety, welfare, the environment, or wildlife resources, by failing to investigate, clean up, and document impacts resulting from the 29 spill/release Locations described in Exhibit A.

17. Moreover, based on KPK's actions described above, the Director has objective grounds and reasonable cause to determine that a focused suspension of operations is necessary at each of the 87 related facilities described in Exhibit A to ensure that no additional spills or releases occur at these Locations before the initial spill/release has been cleaned up.

18. The matters summarized in Exhibit A are impacting or threatening to impact public health, safety, welfare, the environment, or wildlife resources requiring action by the Director to avoid, minimize, or mitigate those impacts or threatened impacts.

19. Therefore, the Director hereby requires KPK to take the following actions to avoid, minimize, or mitigate the potential impacts to public health, safety, welfare, the environment, or wildlife resources.

## <u>ORDER</u>

In accordance with Rule 901.a., the DIRECTOR ORDERS that KP Kauffman Company Inc. ("KPK"):

- 1. Immediately suspend all production operations at each of the 87 related facilities described in Exhibit A, and
- 2. Immediately commence, and diligently continue, work to investigate, clean up, and document impacts, as outlined by previously approved Form 27 workplans, resulting from the 29 spill/release Locations described in Exhibit A.

This Order will remain in effect until such time as KPK has performed appropriate assessment and remediation at each Location, and receives a No Further Action ("NFA") for each project, at which point KPK will be permitted to return each Location and the related wells to production.

Prior to receiving a NFA for each project, COGCC will require that all sample confirmation results, waste disposal documentation, field notes, and any other pertinent remediation documentation is submitted prior to closing any related project. COGCC will require notice from KPK at least 48-hours in advance prior to backfill of any open excavations related to their remediation projects. COGCC will perform inspections at each Location to document that final backfill and surface grading was performed prior to approval of NFA.

For Locations with groundwater impacts, COGCC will approve resumption of production operations only when the full extent of impacts has been delineated, all impacted source material has been removed, and a sufficient monitoring network with point of compliance wells has been established. Only once a Supplemental Form 27 has been submitted by KPK with an appropriate remediation plan to address any residual impacts to groundwater, will COGCC consider authorizing resumption of production.

All questions regarding the work KPK must immediately commence to investigate, clean up, and document impacts, as required by this Order, should be directed to John Axelson, East Area Environmental Supervisor.

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The provisions contained in the above Order shall become effective immediately. If KPK does not comply with the Order, the Director may take action to assess and remediate the Locations and seek costs pursuant to § 34-60-124, C.R.S.

The Director expressly reserves the right to alter, amend, or repeal any and/or all of the above orders.

EXECUTED this 12th day of April, 2021.

## IN THE NAME OF THE STATE OF COLORADO

OIL AND GAS CONSERVATION COMMISSION

Murphy

Julie Murphy, Director

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#### CERTIFICATE OF SERVICE

On April 12, 2021, a true and accurate copy of this **Director's Order Pursuant to Rule 901.a.** was served by certified U.S. Mail, return receipt, as follows:

KP Kauffman Company Inc. Attn: Ross Watzman 1675 Broadway, Ste. 2800 Denver, CO 80202

On April 12, 2021, a true and accurate copy of this **Director's Order Pursuant to Rule 901.a.** was also emailed, as follows:

RWatzman@kpk.com MKnop@kpk.com cbourke@swlaw.com

Jøremy I. Ferrin Enforcement Supervisor

## EXHIBIT A

# Summary of KPK Locations Subject to Rule 901.a. Suspension of Operations

## 1) Remediation Project No. 16131/ Spill ID 478086 (CL)F UPRR 43 PAN AM G Consolidation #2

NOAV #402523412 issued 11/2/2020

Spill Discovery Date 9/19/2020

Last Form 27 Submittal 11/24/2020 (Doc #402539254)

Last Inspection Date: 2/22/2021 (Doc #691201389)

- Summary of Incident: Landowner discovered and notified KPK of an ongoing flowline release. KPK reported they shut-in and depressurized the flowline system and removed standing liquids the same day. During an inspection on 9/23/20 COGCC Inspectors heard a hissing noise and observed gas releasing from a hole in the flowline and pooled liquid hydrocarbons. The flowline is located adjacent to a county road. Inspectors evacuated the location and called KPK for emergency response and exercised Stop Work Authority due to imminent health and safety hazards. KPK personnel determined that an isolation valve was not functioning properly. This incident posed a significant risk to public health and safety for at least four days to anyone using the county road and the adjacent residence. KPK depressurized the line approximately four hours after COGCC personnel notified KPK of the incident, however it was not isolated. An inspection on 9/25 found the line was releasing gas again and KPK personnel were working adjacent to the release without personal 4-gas meters. The line was finally isolated on 9/25. KPK filed a Form 22 Accident Report for the near miss (Doc#402496504) and a Form 44 Flowline Report for a Grade 1 Gas Leak (Doc#402496503).
- Summary of Environmental Concerns:
  - O Uncontrolled release into the atmosphere adjacent to a public road and residence for approximately 6 days.
  - O Excavation remains open.
  - O Groundwater present in excavation in contact with impacted soils<sup>1</sup>.
  - O Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - O Surface water: ~85'
  - O Residence: ~250'
  - O Water well: ~400'
  - O Mapped Wetland: ~55'
  - O Located within a High Priority Habitat

Associated Wells:

UPRR 43 PAN AM G #1	05-123-07957
UPRR 43 PAN AM G #2	05-123-08087
UPRR 43 PAN AM G #3	05-123-08075
UPRR 43 PAN AM G #4	05-123-08673

<sup>&</sup>lt;sup>1</sup> Contamination in contact with groundwater is an ongoing impact to groundwater resources and may cause a plume to continue to grow and migrate to adjacent water wells and surface water.

UPRR 43 PAN AM G #6	05-123-08749
UPRR 43 PAN AM G #7	05-123-08750
UPRR 43 PAN AM G #8A	05-123-09254
UPRR 43 PAN AM G #12	05-123-08982

## 2) Remediation Project No. 12158/Spill ID 465921 (CL) & Spill ID 469224 (CL)

Grant Tank Battery NOAV #402206828 issued 10/16/2019 Complaint #200446391 submitted 10/30/2018 Complaint #200448619 submitted 2/4/2020

Spill Discovery Date 10/30/2018

Last Form 27 Submittal 3/25/2021 (Doc #402640251 - In Process)

Last Inspected 3/24/2021

- Summary of Incident: Impacts to groundwater discovered during a third party Phase II investigation and reported to COGCC via complaint.
- Summary of Environmental Concerns:
  - Excavation appears to still be in process with minimal progress.
  - Excavation has been in progress since July 1, 2019 (removal of produced water tank).
  - Groundwater present in excavation in contact with impacted soils.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~30'
  - Mapped Wetland: ~30'
  - Public Road: Adjacent
  - Residence: ~350'
  - Water well: ~100'
  - School: ~800'

Associated Wells:

GRANT #1	05-123-08568
GRANT #2	05-123-08641
GRANT #3	05-123-09307
GRANT #4	05-123-09309

3) Remediation Project No. 13446/ Spill ID 463820 (CL) & Spill ID 477605 (AC) Facility #4 North Consolidation

*NOAV* #402139759 issued 8/9/2019; closed 8/18/2020 pursuant to Order 1V-728 Spill Discovery Date 4/4/2019 & 7/31/2020

Last Form 27 Submittal 3/26/2021 (Doc #402640636 - In Process) Last Inspected Date 2/22/2021 (Doc #691201392)

- Summary of Incident: Two separate spills occurred on this location related to the same flowline.
  - On 03/27/2019 oil surfaced on the north side of Tipple Parkway directly across from the Frederick High School. Although the line was repaired and returned to service, the impacts were never assessed or remediated.
  - On 7/30/2020, the Town of Frederick Fire Department notified KPK of an ongoing release within the road. Release of fluids created multiple cracks along

Tipple Parkway disrupting a primary city street. Due to rain at the time of release, E&P waste fluids were washed into the storm sewer.

- KPK failed to properly report, characterize and remediate the first release for which NOAV #402139759 was issued. According to City of Frederick personnel, hydrocarbons still emerge from the cracks in the street during storm events. KPK has performed no additional work to delineate or remediate impacts from either release.
- Summary of Environmental Concerns:
  - It appears KPK has not conducted any additional site investigation since the 9/25/2020 inspection.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Receptors include buried utilities and groundwater. Vapor phase hydrocarbon migration is also a threat to public safety and the environment.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Buried underground utilities adjacent
  - Surface water: ~390'
  - School: ~430' (ballfields)
  - Residence: ~40'
- Associated Wells:

THOMAS L RUSSELL 'B' #2 THOMAL L. RUSSELL 'D' #2 TOM RUSSELL 'D' #1 JILLSON #3 GUADAGNOLI #1 GUADAGNOLI #2

05-123-08817 05-123-08818 05-123-08595 05-123-08574 05-123-08298 05-123-08707

#### 4) Remediation Project No. 14115/ Spill ID 476532(CL)

HORST-SCHUTT PW Storage Vessel Complaint #200448957 received 5/18/2020 Complaint #200449254 received 11/9/2020 Spill Discovery Date 5/18/2020

Last Form 27 Submittal 10/13/2020 (Doc #402509994)

Last Inspection Date 2/23/2021 (Doc #691201422)

- Summary of Incident: A Form 27 was initially submitted to investigate apparent historical tank overflow of produced fluids documented during 8/28/2019 field inspection (Doc #693501203). An additional spill was reported 5/18/2020 for tank overflow. A complaint was received 11/9/2020 regarding open excavation and venting.
- Summary of Environmental Concerns:
  - O Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs<sup>2</sup>.
  - O <u>No additional excavation appears to have been conducted</u> since the 9/24/2020 inspection.
  - O Due to the removal of the only produced water storage vessel at this location

<sup>&</sup>lt;sup>2</sup> As defined in the 100 Series Rules: BEST MANAGEMENT PRACTICES (BMPs) are practices that are designed to prevent or reduce impacts caused by oil and gas operations to air, water, soil, or biological resources, and to minimize adverse impacts to public health, safety and welfare, including the environment and wildlife resources.

and KPK provided production records for associated wells (indicating 700 barrels of produced water per well for each of three wells as of 11/13/2020) COGCC inspections on 11/13/2020 requested records to document disposal of E&P waste<sup>3</sup>. No documentation has been provided by KPK to date.

- O Groundwater present in excavation in contact with impacted soils.
- O Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
- O Residence: ~750' Associated Wells:

05-123-10149
05-123-09162
05-123-09367
05-213-10170

5) Remediation Project No. 15797/ Spill ID 476987 (AC)

NESSU Consolidated Line NOAV #402548397 issued 12/7/2020 Complaint #200448569 submitted 1/5/2020 Complaint #200449321 submitted 1/1/2021 Spill Discovery Date 11/28/2018 Last Form 27 Submittal 4/6/2021 (Doc #402649642 - In Process)

Last Inspected 2/22/2021 (Doc #697601227)

- Summary of Incident: Produced fluids daylighted to surface from a leaking flowline and was reported to KPK by landowner. Remedial excavation is still pending. Excavation performed to access the flowline for repairs is still open. KPK has not performed a site assessment to delineate the extent of impacts and no remediation has been performed.
- Summary of Environmental Concerns:
  - Multiple complaints from landowners alleging agricultural use of the property has been impacted.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Site investigation start date listed as 12/14/2020; flowline access excavation open on 2/22/2021 no evidence remedial assessment or excavation has been documented.
  - Inadequate fencing around open excavation resulting in a threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map): O Residence: ~570'

Associated Wells:

NESSU #2	05-123-08811
NESSU #3	05-123-07724
NESSU #4	05-123-08810
LAMB-DALTON NESSSU #13	05-123-08018
NESSSU #14	05-123-08858

<sup>&</sup>lt;sup>3</sup> Produced Water

NESSSU #15 NESSSU-KINDER #16 05-123-07822 05-123-08713

- 6) Remediation Project No. 16137/ Spill ID 478014 (AC) James S Haley Trustee B #2 Flowline Spill Discovery Date 9/4/2020 Last Form 27 Submittal 11/23/2020 (Doc #402537565) Last Inspection Date 3/29/2021 (Doc #689501177)
  - Summary of Incident: Flowline spill discovered after nearby business notified the COGCC of stained soil. COGCC notified KPK of the possible spill. Additional spill at same location discovered by COGCC inspection on 2/22/2021.
  - Summary of Environmental Concerns:
    - Impacted surface soils have been scraped but <u>no additional remediation/spill</u> <u>excavation has occurred</u>.
    - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
    - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
    - 2/22/2021 inspection discovered a potential second spill at the same location; stained soils remain on surface as of 3/29/2021 inspection.
  - Sensitive Receptors Nearby (as located in COGIS map):
    - Nearby business: ~100'

Associated Wells:

JAMES S HALEY TRUSTEE B #2

05-123-08651

7) Remediation Project No. 15743/ Spill ID 476918 (CL)

Robert G Berge #2 Spill Discovery Date 6/15/2020 Last Form 27 Submittal 12/4/2020 (Doc #402546972) Last Inspected 4/1/2021 (Doc #689501173)

- Summary of Incident: Spill was reported to KPK by the tenant farmer when hydrocarbon fluids surfaced on the property from a subsurface flowline. The spill occurred directly adjacent to the Brantner Ditch and hydrocarbon fluids migrated from the spill area into the ditch which was flowing at the time causing an impact to surface water. KPK installed multiple sections of booms to try to contain hydrocarbon fluids. Excavation has caused a collapse of the sidewalls of the New Brantner Irrigation Ditch. KPK has not submitted a Form 27 for current excavation activity. KPK failed to consult with Ditch Company as required by Rule 912.c.(2) and entered and performed excavation in their right-of-way without any notification. KPK reported to the COGCC that consultation was made however, correspondence with with Ditch Company board members and the ditch rider denied that assertion (Document #1561546).
- Summary of Environmental Concerns:
  - Irrigation Canal has been damaged without access agreement.
  - Ditch operator will not be able to make use of the ditch until KPK has repaired the damaged section.
  - Recent excavation of spill area has occurred but no documentation of confirmation sample results has been submitted to verify impacted soils have been removed.

- Groundwater present in excavation in contact with impacted soils.
- Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- No fencing around open excavation.
- Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs. Stockpile is immediately adjacent to, and upslope of the New Brantner Ditch.
- Hydrocarbons observed on groundwater at the bottom of the excavation.
- Sensitive Receptors Nearby (as located in COGIS map):
- Surface Water 0' Impacted Associated Wells:

ROBERT G BURGE #2

05-123-09211

8) Spill ID 478542 (AC)

Cosslet A 9 Flowline Spill Discovery Date 11/11/2020 Last Form 19 Submittal 11/19/2020 (Doc #402536704) Last Inspection Date 3/29/2021 (Doc #689501180)

- Summary of Incident: Flowline spill discovered by 3rd party during an aerial leak detection survey.
- Summary of Environmental Concerns:
  - Free product<sup>4</sup> observed on groundwater in open excavation. First observed during 2/22/2021 inspection. Groundwater is impacted.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
  - Inadequate fencing around open excavation resulting in a threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Nearest surface water: ~90'
  - Mapped Wetland: ~85'
  - Water well: ~200'

Associated Wells:

COSSLETT A #4 COSSLETT A #9 05-123-08435 (appears associated on COGIS) 05-123-09157 (listed on Form 19)

#### 9) Spill ID 479232 (AC)

Paul Heinze #1 Flowline Spill Discovery Date 1/17/2021 Last Form 19 Submittal 1/25/2021 (Doc #402581683) Last Inspection Date 3/29/2021 (Doc #689501182)

• Summary of Incident: Flowline spill discovered by 3rd party (spill surfaced) and

<sup>&</sup>lt;sup>4</sup> Free Product: Petroleum that exists as a separate phase that does not mix with or dissolve in water. Free product is observed as gross contamination floating on top of water or pooled on the surface. Also known as Free Phase Product and Light Non-Aqueous Phase Liquid (LNAPL).

reported to KPK.

- Summary of Environmental Concerns:
  - Free product observed on groundwater in open excavation. First observed during 2/22/2021 inspection. Groundwater is impacted.
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
  - Inadequate fencing around open excavation resulting in a threat to public safety and wildlife.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Located within a High Priority Habitat
  - Mapped Wetland: ~260'

Associated Wells:

PAUL HEINZE #1	05-123-08382
PAUL W HEINZE #2	05-123-08796

#### 10) Remediation Project No. 16135/ Spill ID 478005 (CL)

H. Huett Consolidation Release Spill Discovery Date 9/14/2020 Last Form 27 Submittal 11/20/2020 (Doc #402537539) Last Inspection Date 2/22/2021 (Doc #691201387)

- Summary of Incident: Spill was reported to KPK by the landowner when hydrocarbon fluids surfaced on the property from a subsurface flowline; associated wells were shut in and the line depressurized.
- Summary of Environmental Concerns:
  - <u>No additional excavation appears to have been conducted</u> since 9/28/2020 inspection.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Unfenced open excavation presents ongoing threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: 15' (Brighton Irrigation Ditch)
    - Residence: ~300'
    - Water well: ~430'
    - High Priority Habitat: ~315'
- Associated Wells:

JOSEPH L HUETT UNIT C#1	05-123-09671
WATTENBERG, HENRY E #B-1	05-123-09678
WATTENBERG HENRY E UT B #2	05-123-10113
WATTENBERG, HENRY E. UNIT #C-1	05-123-10112

#### 11)Spill ID 478617 (AC)

Jillson 'A' #1 Spill Discovery Date 11/23/2020 Last Form 19 Submittal 11/25/2020 (Doc #402540541) Last Inspected 2/22/2021 (Doc #691201395)

- Summary of Incident: COGCC Field Inspection (Doc #699302980) observed an ongoing produced water release from the Jillson 'A' #1 surface casing. At the time of notification, KPK did not believe release was associated with wellhead based on performed bradenhead and flowline integrity tests. KPK is investigating the area to determine the source of fluids and cause of release.
- Summary of Environmental Concerns:
  - <u>No site investigation appears to have been conducted by KPK.</u>
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Residence: ~590'
  - Wetland: ~550'

Associated Wells:

JILLSON 'A' #1

05-123-08777

#### 12) Spill ID 479267 (AC)

Longmont Farms Unit #5 Flowline Spill Discovery Date 1/19/2021 Last Form 19 Submittal 1/29/2021 (Doc #402586838) Last Inspected 2/22/2021 (Doc #689501116)

- Summary of Incident: Surface staining observed by KPK personnel along the flowline path.
- Summary of Environmental Concerns:
  - Surface soils have been scraped but <u>no excavation or site investigation appears</u> to have been conducted by KPK.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Residence: ~500'

Associated Wells:

LONGMONT FARMS UNIT #5

05-123-13222

## 13) Remediation Project No. 16538/ Spill ID 478861 (AC)

Premium Turkey Farm PW Vault

Spill Discovery Date 12/17/2020

Last Form 27 Submittal 2/2/2021 (Doc #402589629)

Last Inspected 2/23/2021 (Doc #689501118)

- Summary of Incident: Concrete PBV<sup>5</sup> with discovered integrity issues based on the results of a hydrostatic load test performed on 12/16/20 through 12/17/20. PBV will be removed. Form 27 Workplan lists 6/1/2021 start date for removal of the PBV
- Summary of Environmental Concerns:
  - As of 2/23/2021 inspection <u>no work had been done on site</u>
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater

<sup>&</sup>lt;sup>5</sup> PBV: Partially Buried Vessel

due to the potential for subsurface migration.

- Vault integrity issues remain unresolved. All wells related to this battery have a status of Producing in the COGIS database with no record or indication of alternate disposal methods for produced water.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Water Well: ~390'

• Located in a dairy; fencing present to prevent livestock access Associated Wells:

PREMIUM TURKEY FARMS C #1	05-123-07876
PREMIUM TURKEY FARMS B #2	05-123-08985
PREMIUM TURKEY FARMS C #2	05-123-08943

#### 14) Remediation Project No. 12783/ Spill ID 459955 (CL)

Eugene Doversberger #2

Spill Discovery Date 12/10/2018

Last Form 27 Submittal 3/25/2021 (Doc #402640008 - In Process)

Last Inspected 2/23/2021 (Doc #691201397)

- Summary of Incident: Initial spill occurred when a 3rd party hit KPK's flowline during an excavation (which has subsequently been resolved by the 3rd party). During spill clean-up a historical spill was discovered.
- Summary of Environmental Concerns:
  - Limited subsurface investigation conducted 9/29/2020 results not submitted to COGCC; <u>no additional site investigation</u> has been conducted by KPK since.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptor's Nearby (as located in COGIS map):

• Located in and immediately adjacent to an irrigation ditch (Brantner Ditch). Associated Wells:

DOVERSBERGER, EUGENE #3	05-123-09037
DOVERSBERGER, EUGENE #2	05-123-07715

#### 15) Spill ID 477603 (AC)

Peltier #2 Flowline

Spill Discovery Date 7/27/2020

Last Form 19 Submittal 8/6/2020 (Doc #402460842)

Last Inspected 2/22/2021 (Doc #691201403)

- Summary of Incident: Spill was reported to KPK via phone on the emergency contact line when hydrocarbon fluids surfaced from a subsurface flowline. KPK and the local fire department responded to the emergency call. KPK stated that the cause and position of the flowline failure will be assessed when excavation activities uncover the point of failure.
- Summary of Environmental Concerns:
  - <u>No excavation/site investigation</u> appears to have been conducted by KPK.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):

• Residence: ~160'.

Associated Wells:

PELTIER UNIT B #1 PELTIER #2 05-123-08491 05-123-09060

#### 16) Remediation Project No. 15961/ Spill ID 477437 (AC)

Yoxall Farms Manifold

Spill Discovery Date 7/24/2020

Last Form 27 Submittal 3/31/2021 (Doc #402644652 - In Process) Last Inspected 2/22/2021 (Doc #691201405)

- Summary of Incident: Spill was reported to the COGCC by a 3rd party operator when hydrocarbon fluids surfaced from a subsurface flowline. COGCC performed an inspection and required KPK to submit a Form 19. Spill is within a monitoring array of a 3rd party operator's remediation project.
- Summary of Environmental Concerns:
  - O <u>No excavation/site investigation</u> has been conducted by KPK. Most recent Form 27 submittal reports surface soils have been scrapped but remain on location.
  - O Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptor's Nearby (as located in COGIS map):
  - O Surface Water: ~100'
  - O Wetlands: ~80'
  - O Located within a High Priority Habitat

Associated Wells:

HARRIET W LUCKE #1 05-123-07772 HARRIET W LUCKE #2 05-123-08797 YOXALL FARMS #1 05-123-07732 YOXALL FARMS #2 05-123-07815 YOXALL FARMS #3 05-123-07917 YOXALL FARMS #4 05-123-08930 YOXALL FARMS #5 05-123-08931 YOXALL FARMS #6 05-123-09089

## 17) Remediation Project No. 15811/ Spill ID 477024 (AC)

Lawrence Totems Consolidation Line

Spill Discovery Date 6/22/2020

Last Form 27 Submittal 4/6/2021 (Doc #402649657 - In Process)

Last Inspected 2/22/2021 (Doc #691201407)

- Summary of Incident: Flowline release discovered by KPK personnel. Potholing work was performed on 6/23/2020 to determine the location of the flowline failure. Aside from initial potholing efforts, only surface impacts were addressed at this time.
- Summary of Environmental Concerns:
  - O Oily waste (hydrocarbon impacted soil) from initial flowline potholing stockpiled on site with inadequate BMPs.
  - O <u>No excavation/site investigation</u> appears to have been conducted by KPK since the 9/27/2020 inspection.
  - O Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - O Nearest surface water: ~140'

O Wetlands: ~130'

O Located within a High Priority Habitat

Associated Wells:

UPRR 43 PAN AM I #3	05-123-08473
UPRR 43 PAN AM I #15	05-123-08966
UPRR 43 PAN AM I #16	05-123-08967

18) Remediation Project No. 15825/ Spill ID 474780(AC) Cosslett #3

Spill Discovery Date 3/11/2020 Last Form 27 Submittal 3/31/2021 (Doc #402645026 - In Process) Last Inspected 2/22/2021 (Doc #402610717)

- Summary of Incident: Flowline release discovered by a 3rd party operator. KPK reported no pooled liquids were present however a Grade 1 Gas Leak was reported (Document #402359259). A Form 19 was not initially submitted as KPK believed the spill volume to be under 1bbl. COGCC inspection on 03/11/2020 required a Form 19 be submitted within 72 hrs of spill notification because there was an unknown volume of spill fluids from a buried flowline and a potential threat to groundwater.
- Summary of Environmental Concerns:
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
  - <u>Surface soils were scraped but no excavation/site investigation</u> appears to have been conducted by KPK.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Residence: ~750'

Associated Wells:

COSSLETT #3

05-123-08433

## 19) Remediation Project No. 15771/ Spill ID 472963 (CL)

Facility #7 Consolidation Line Spill Discovery Date 3/4/2020 Last Form 27 Submittal 3/31/2021 (Doc #402644723 - In Process) Last Inspected 2/22/2021

- Summary of Incident: Flowline failure discovered when produced fluids daylighted to the surface; the line was shut-in. Excavation work to remove impacted soil and expose the location of the flowline failure was scheduled to begin on 03/05/2020. During an inspection on 3/11/2020 COGCC flowline inspector noted that initial clean up and removal of impacted soils had occurred as part of the repair.
- Summary of Environmental Concerns
  - <u>No additional excavation/site investigation</u> appears to have been conducted by KPK since initial excavation/flowline repair.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~105'

 Mapped wetlands: ~100'
Associated Wels: JOHN WEIGANDT B #1 WEIGANDT, JOHN H. #A 1

05-001-08841 05-001-08693

#### 20) Remediation Project No. 16029/Spill ID 477774 (AC)

Haudrich #2 Flowline

Spill Discovery Date 8/30/2020 Last Form 27 Submittal 4/6/2021 (Doc #402649838)

Last Inspected 3/10/2021 (Doc #69760123)

- Summary of Incident: Spill was reported to KPK by a 3rd party operator who discovered hydrocarbon fluids had surfaced from KPK's subsurface flowline while conducting a routine inspection of a co-located flowline.
- Summary of Environmental Concerns:
  - <u>No excavation/site investigation</u> has been conducted by KPK.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Standing fluid (and apparent hydrocarbon sheen) was observed ~4' below surface at the bottom of the open hole on 9/3/2020 indicating potential impacts to groundwater.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~70'
  - Residence: ~250'
  - Water well: ~375'

Associated Wells:

HAUDRICH #2

05-123-08960

## 21) Spill ID 465402 (AC)

John Weigandt Consolidation Spill Discovery Date 10/6/2020 Last Form 19 Submittal 12/31/2020 (Doc #402564583) Last Inspected 2/22/2021 (Doc #691201417)

- Summary of Incident: Produced fluids from a flowline release daylighted to surface
- Summary of Environmental Concerns:
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
  - <u>No additional excavation</u> appears to have been conducted by KPK since the 10/14/2020 inspection.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Inadequate fencing around open excavation resulting in a threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~220'
  - Mapped wetlands: ~350'

Associated Wells:

JOHN WEIGANDT B 1

05-001-08841

WEIGANDT, JOHN H. A 1

05-001-08693

#### 22) Remediation Project No. 13908/ Spill ID 464277 (CL)

Parker #44-15

Spill Discovery Date 5/2/2019

Last Form 27 Submittal 10/6/2020 (Doc #402504225)

Last Inspection Date 2/23/2021 (Doc #691201422)

- Summary of Incident: Spill was discovered during a COGCC inspection on 5/2/2019 (Doc #688402093) with observed hydrocarbon impacts around the produced water tank. The tank was removed 5/8/2019 (inspection doc #690101205).
- Summary of Environmental Concerns:
  - O No changes to site between 5/4/2020 and 2/23/2021 inspections.
  - O Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - O Fencing is down around open excavation resulting in an ongoing threat to public safety and wildlife.
  - O Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
- Sensitive Receptors Nearby (as located in COGIS map):

O Residence: ~250'

Associated Wells:

PARKER 44-15

05-123-16001

#### 23) Spill ID 478370 (AC)

Suckla-Brown Unit 17 Header Spill Discovery Date 10/1/2020 Last Form 19 Submittal 10/23/2020 (Doc #402517683) Last Inspected: 3/29/2021 (Doc #689501175)

- Summary of Incident: Stained soil at flowline manifold observed by COGCC on during 10/1/2020 field inspection (Doc# 699501738).
- Summary of Environmental Concerns:
  - Groundwater present in excavation in contact with impacted soils. Sheen observed during inspections.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Unfenced open excavation resulting in an ongoing threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Water Well: ~100'

#### Associated Wells:

SUCKLA-BROWN UNIT #1	05-123-07480
SUCKLA-BROWN UNIT NAV #7	05-123-07485
SUCKLA-BROWN UNIT #8	05-123-07484
SUCKLA-BROWN UNIT #12	05-123-08873
SUCKLA-BROWN UNIT #13	05-123-08874
SUCKLA-BROWN UNIT #16	05-123-08877
SUCKLA-BROWN UNIT #17	05-123-09485

#### 24) Remediation Project No. 15829/ Spill ID 459299 (AC)

Facility #4 West A Consolidation Flowline Release

Spill Discovery Date 11/28/2018

Last Form 27 Submittal 4/6/2020 (In Doc #402649620- In Process)

Last Inspected 12/7/2018 (Doc #690100912)

- Summary of Incident: Historical release discovered by a third party installing a new line.
- Summary of Environmental Concerns:
  - Groundwater visible in excavation in 2018 inspection (Doc #690100912); inspection photos appear to show hydrocarbon sheen.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Site investigation start date listed as 12/14/2020; <u>no excavation visible</u> 2/22/2021.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface Water: 550'
  - Located within a High Priority Habitat

Associated Wells:

MILTON H. NELSON #1 MILTON H. NELSON UNIT B #1 MILTON H. NELSON UNIT C #1 MILTON H. NELSON F #1 ARTHUR STROMQUIST #1 MAX SERAFINI 'B' #1 SERAFINI 'B' #2 SERAFINI 'B' #3

05-123-09182 05-123-09493 05-123-09481 05-123-10469 05-123-10470 05-123-08705 05-123-09515 05-123-13579

## 25) Spill ID 479483 (AC)

Amoco-Charter-Schneider #7 Spill Discovery Date 2/19/2021 Last Form 19 Submittal 2/25/2021 (Doc #402611173) Last Inspection 3/29/2021

- Summary of Incident: Produced fluids from a flowline release daylighted to surface and was discovered by KPK. KPK was backfilling the excavation on 3/29/2021. No analytical data has been provided by KPK to verify that impacts have been delineated or removed prior to initiating backfill.
- Summary of Environmental Concerns:
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):

Residence: ~140' (houses surround area)

Associated Wells:

0

AMOCO-CHARTER-SCHNEIDER 7

05-123-07958

26) Spill ID 479484 (AC)

Woolley#1 Spill Discovery Date 2/22/2021 Last Form 19 Submittal 3/13/2021 (Doc #402623005) Last Inspected 2/23/2020 (Doc #690102316)

- Summary of Incident: Third party line strike.
- Summary of Environmental Concerns:
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
  - Inadequate fencing around open excavation resulting in a threat to public safety and wildlife.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~260'
  - Residence: ~330'
  - Water well: ~520'

Associated Wells:

WOOLEY 2

05-123-09208

#### 27) Spill ID 479618 (AC)

*Kiefer George W UT B #1A* Spill Discovery Date 3/9/2021 Last Form 19 Submittal 3/18/2021 (Doc #402632509) Last Inspected 3/17/2021 (Doc #690102340)

- Summary of Incident: Produced fluids from a flowline release daylighted to surface and was discovered by KPK.
- Summary of Environmental Concerns:
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
  - Oily waste (hydrocarbon impacted soil) stockpiled on site with inadequate BMPs.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface water: ~580'
  - Residence: ~770'

#### Associated Wells:

KIEFER GEORGE W UT B #1A

05-123-07878

#### 28) Spill ID 479713 (AC)

Camenisch 1 sx Flowline Release Spill Discovery Date 3/29/2021 Last Form 19 Submittal 3/30/2021 (Doc #402644033) Last Inspected 4/1/2021 (Doc #689501173)

- Summary of Incident: Produced fluids from a flowline daylighted to surface and was discovered by KPK. Surface has not been scraped; product still sitting on surface.
- Summary of Environmental Concerns:
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.

• Sensitive Receptors Nearby (as located in COGIS map):

 Surface water: ~135' Associated Wells:

CAMENISCH #1

05-123-07467

#### 29) Remediation Project No. 15773/ Spill ID 469095 (CL)

Facility #8 Consolidation Line

Spill Discovery Date 11/7/2019

Last Form 27 Submittal 4/1/2021 (Doc #402646205 - In Process) Last Inspected 12/5/2019 (Doc #690101562)

- Summary of Incident: Flowline spill discovered by landowner when hydrocarbon impacts daylighted to surface.
- Summary of Environmental Concerns:
  - Groundwater visible in excavation in 2019 inspection (Doc #690101507); inspection photos appear to show hydrocarbon sheen.
  - Vertical and Lateral extent of subsurface impact is unknown at this time. Impacts remain in place resulting in an ongoing threat to soil and groundwater due to the potential for subsurface migration.
- Sensitive Receptors Nearby (as located in COGIS map):
  - Surface Water: 430'
  - High Priority Habitat: ~160'

Associated Wells:

SEBOLD, DOROTHY #B-1 SEBOLD, DOROTHY #B-2 05-123-10126 05-123-10234

## **Consolidated list of Associated Wells**

			Related	<u>Spill #</u>	Remediation
	Well Name	<u> API #</u>	<u>Incident #</u>		<u>#</u>
		05-123-			
1	UPRR 43 PAN AM G #1	07957			
		05-123-			
2	UPRR 43 PAN AM G #2	08087			
		05-123-			
3	UPRR 43 PAN AM G #3	08075			
		05-123-			
4	UPRR 43 PAN AM G #4	08673	1	479096 (CL)	16121
		05-123-		478086 (CL)	10131
5	UPRR 43 PAN AM G #6	08749			
		05-123-			
6	UPRR 43 PAN AM G #7	08750			
		05-123-			
7	UPRR 43 PAN AM G #8A	09254			
		05-123-			
8	UPRR 43 PAN AM G #12	08982			

			<u>Related</u>	Spill #	Remediation
	Well Name	<u>API #</u>	Incident #		<u>#</u>
9	GRANT #1	05-123-	2	465921 (CL) & 469224 (CL)	12158
		05-123-			
10	GRANT #2	08641			
		05-123-			
11	GRANT #3	09307			
		05-123-			
12	GRANT #4	09309			
		05-123-			
13	THOMAS L RUSSELL 'B' #2	08817			
		05-123-			
14	THOMAL L. RUSSELL 'D' #2	08818			
		05-123-			
15	TOM RUSSELL 'D' #1	08595	3	463820 (CL) & 477605	13446
1.0		05-123-		(AC)	
10	JILLSON #3	08574			
17		05-123-			
1/	GUADAGNOLI #1	05-123-			
18	GUADAGNOU #2	03-123-			
10		05-123-			14115
19	ENERGY MINERALS UNIT B 1	10149		476532 (CL)	
		05-123-			
20	MARVIN E. SCHUTT UNIT 1	09162			
		05-123-	4		
21	JOHN HORST B 1	09367			
		05-213-			
22	JOHN HORST B 2	10170			
		05-123-			
23	NESSU #2	08811			
		05-123-			
24	NESSU #3	07724			
25	NESSI #4	05-123-			
25	NESSO #4	06010			
26	LAMB-DALTON NESSSU #13	05-125-	5	476987 (AC)	15797
20		05-123-			
27	NESSSU #14	08858			
<u> </u>		05-123-			
28	NESSSU #15	07822			
		05-123-			
29	NESSSU-KINDER #16	08713			
	JAMES S HALEY TRUSTEE B	05-123-	6	478014 (AC)	16127
30	#2	08651	0	470014 (AC)	1012/

Well Name		<u>API #</u>	<u>Related</u> Incident #	<u>Spill #</u>	Remediation <u>#</u>
		05-123-	7	476918 (CL)	157/13
31	ROBERT G BURGE #2	09211	/	470918 (CL)	13743
		05-123-			
32	COSSLETT A #4	08435	8	478542 (AC)	
		05-123-			
33	COSSLETT A #9	09157			
		05-123-			
34	PAUL HEINZE #1	08382	9	479232 (AC)	
25		05-123-			
55	PAOL W HEINZE #2	06/90			
36		03-123-			
50		05-123-			
37	WATTENBERG. HENRY E #B-1	09678			
	WATTENBERG HENRY E UT B	05-123-	10	16135 (CL)	478005
38	#2	10113			
	WATTENBERG, HENRY E.	05-123-			
39	UNIT #C-1	10112			
		05-123-	11	478617 (AC)	
40	JILLSON 'A' #1	08777	11		
		05-123-	12	479267 (AC)	
41	LONGMONT FARMS UNIT #5	13222		175207 (700)	
	PREMIUM TURKEY FARMS C	05-123-		478861 (AC)	16538
42		07876			
4.2		05-123-	13		
43		08985			
11	PREIVITOIVI TORKET FARIVIS C	02-123-			
44	<u>π</u> ∠	05-123-			
45	DOVERSBERGER, EUGENE #3	09037	14	459955 (CL)	12783
		05-123-			
46	DOVERSBERGER, EUGENE #2	07715			
		05-123-			
47	PELTIER UNIT B #1	08491	15	477603 (AC)	
		05-123-	15		
48	PELTIER #2	09060			
		05-123-			
49	HARRIET W LUCKE #1	07772			
		05-123-			
50	HARRIET W LUCKE #2	08797	16	477437 (AC)	15961
F 1		05-123-			
51	TUXALL FARIVIS #1	07/32			
52	VOYALL EADING #2	07915			
52	I UTALL FARIVIS #2	01912			

Well Name		API #	<u>Related</u> Incident #	<u>Spill #</u>	Remediation #
	<u></u>	05-123-			<u></u>
53	YOXALL FARMS #3	07917			
		05-123-			
54	YOXALL FARMS #4	08930			
		05-123-			
55	YOXALL FARMS #5	08931			
		05-123-			
56	YOXALL FARMS #6	09089			
		05-123-			
57	UPRR 43 PAN AM I #3	08473			
		05-123-	17	477024 (AC)	15811
58	UPRR 43 PAN AM I #15	08966	1/	477024 (AC)	13011
		05-123-			
59	UPRR 43 PAN AM I #16	08967			
		05-123-	18	474780(AC)	15825
60	COSSLETT #3	08433			
		05-001-			
61	JOHN WEIGANDT B #1	08841	19	472963 (CL)	15771
6		05-001-			
62	WEIGANDT, JOHN H. #A I	08693			
63		05-123-	20	477774 (AC)	16029
05		05-001-			
64	IOHN WEIGANDT B 1	08841			
-		05-001-	21	465402 (AC)	
65	WEIGANDT, JOHN H. A 1	08693			
		05-123-			
66	PARKER 44-15	16001	22	464277 (CL)	
		05-123-			
67	SUCKLA-BROWN UNIT #1	07480			
	SUCKLA-BROWN UNIT NAV	05-123-			
68	#7	07485			
		05-123-			
69	SUCKLA-BROWN UNIT #8	07484			
		05-123-	23	478370 (AC)	
70	SUCKLA-BROWN UNIT #12	08873			
<b>_</b>		05-123-			
/1	SUCKLA-BROWN UNIT #13	08874			
		05-123-			
12	SUCKLA-RKOWN ONIT #10				
77		05-123-			
/3	JUCKLA-DRUWIN UNIT #1/	05465			
74	MILTON H NELSON #1	03-123-	24	459299 (AC)	15829
73 74	SUCKLA-BROWN UNIT #17 MILTON H. NELSON #1	09485 05-123- 09182	24	459299 (AC)	15829

			<u>Related</u>	Spill #	Remediation
	Well Name	<u>API #</u>	Incident #		<u>#</u>
	MILTON H. NELSON UNIT B	05-123-			
75	#1	09493			
	MILTON H. NELSON UNIT C	05-123-			
76	#1	09481			
		05-123-			
77	MILTON H. NELSON F #1	10469			
		05-123-			
78	ARTHUR STROMQUIST #1	10470			
		05-123-			
79	MAX SERAFINI 'B' #1	08705			
		05-123-			
80	SERAFINI 'B' #2	09515			
		05-123-			
81	SERAFINI 'B' #3	13579			
	AMOCO-CHARTER-	05-123-	25	470402 (AC)	
82	SCHNEIDER 7	07958	25	479483 (AC)	
		05-123-	20	470404 (AC)	
83	WOOLEY 2	09208	20	479484 (AC)	
		05-123-	27	479618 (AC)	
84	KIEFER GEORGE W UT B #1A	07878	27		
		05-123-	28	TBD	
85	CAMENISCH #1	07467			
		05-123-			
86	SEBOLD, DOROTHY #B-1	10126	20	469095 (CL)	15770
		05-123-	29		15//3
87	SEBOLD, DOROTHY #B-2	10234			

## KPK 901.a Order - Exhibit B

