

From: Spry ORourke, Linda
To: ["Jensen Jr., Charles H."](#)
Cc: [Friesen, Kathy](#); [Fischer, Alex](#)
Subject: RE: Dry Hollow Pipeline Release (non-facility id 429326)
Date: Thursday, June 28, 2012 3:03:00 PM

Charlie,

The abatement actions are not likely to change. The due date was chosen based on the report that at least one well goes dry within 2 weeks if the ditch doesn't have water. That implies that recharge occurs in two weeks. Two weeks from the date of the release would then theoretically be the soonest that impacted water could show up in the domestic wells. Two weeks after the release would be tomorrow. In choosing dates, I allowed for between two and three weeks after the release to conduct the sampling, in case the two weeks recharge was inexact. Our contractor was able to sample the three wells in a single day. It makes sense to have the workplan done before the fieldwork begins. When Chris Hines called me earlier this week to discuss projects and brought this one up, I told him about the July 10th date for needing the wells resampled. The workplan doesn't have to be elaborate or lengthy. I apologize that the science behind the rationale for choosing the date when the wells need to be sampled by is not so handy with the holiday. Does Encana close down for part of that week? I suppose one option would be to use the contractor I used; he knows just where the wells are, who to contact for sampling and the analytical suite. That might make that part less painful. If we delay longer than 3 weeks, I believe the landowners will view it as an effort to 'not find' a potential impact. Therefore, I think it important that the sampling occur based on the science schedule.

I am having technical issues with getting the NOAV into the system, so it is not likely to occur today after all. But, I'm not likely to change what goes into the NOAV either.

Linda Spry O'Rourke
Environmental Protection Specialist, Northwest Region
Colorado Oil & Gas Conservation Commission
707 Wapiti Court
Suite 204
Rifle, CO 81650

(970) 625-2497 Office
(970) 625-5682 Fax
(970) 309-3356 Cellular
linda.spryorourke@state.co.us

From: Jensen Jr., Charles H. [<mailto:Charles.Jensen@encana.com>]
Sent: Thursday, June 28, 2012 2:28 PM
To: Spry ORourke, Linda
Cc: Friesen, Kathy; Fischer, Alex
Subject: RE: Dry Hollow Pipeline Release (non-facility id 429326)

Hi Linda,

Thanks for the info...based on our current data and any data you might have, can this draft be modified? Our soil data at the source and the ditch water samples (including the scum) does not show impacts. Also, next week is a holiday week (July 4th) as people are gone (including homeowners) and labs are closed. Can the July 10th date be moved a few days?

Charlie

From: Spry ORourke, Linda [<mailto:Linda.SpryORourke@state.co.us>]
Sent: Thursday, June 28, 2012 2:17 PM
To: Jensen Jr., Charles H.
Cc: Friesen, Kathy; Fischer, Alex
Subject: Dry Hollow Pipeline Release (non-facility id 429326)

Hi Charlie,

As we discussed last week, COGCC will be issuing an NOAV for this release which directly impacted waters of the state. I want to let you know I am preparing to enter this NOAV into our system this afternoon. However, because I understand that reporters can see the NOAV as soon as I begin entering it, I want to let you know what it will contain, in the event you get calls. I am working remotely today so have some logistics to juggle before I can get a signed copy of the official NOAV emailed to you later today. In the meantime, here is the pertinent information that will be in the NOAV.

Facility 429326

SWSE 7 6S 92W

Date of Alleged Violation: 6/16/2012

Describe Alleged Violation: A pipeline containing produced water and flowback water developed a sudden leak at the above location, resulting in ~50 bbls of E&P waste water (produced and recycled water) being released into the Davis irrigation ditch, which is a water of the state. Encana personnel noticed a sudden pressure drop in the line and identified the leak. Encana reported the incident to the CDPHE-incident #2012-0427. Encana filed a verbal report to the COGCC and have submitted a Form 19 Spill Report. Encana pumped water out of the ditch to recover the fluids, repaired the line, and collected soil samples. A complaint (#200353851) was filed with the COGCC by one downstream ditch user regarding possible impacts to their pond and spring. Ditch users downstream of the release reported seeing iridescent and/or odorous scum collect intermittently along the ditch. Ditch users reported that the ditch recharges the aquifer containing their domestic water wells. One downstream ditch user reported that their well is dry in two weeks if there is no water flow in the ditch.

Act, Order, Regulation, Permit Conditions Cited: 324.A.a, 324.A.b, 907.a.(1), 907.a.(2)

Abatement Due Date: 07/09/2012 (Please note I've tried to word this so that the 'plan' (not all the sampling and reporting) is due 7/9/2012, since sampling must

occur by 7/10/2012 at the three locations I sampled last week.

Abatement actions: 1. Submit a written engineering evaluation of the pipeline failure, and actions to be taken to prevent a repeat occurrences 2. Provide a work plan for an investigation into possible impacts from the release including A.) a desktop and field reconnaissance well search to identify both permitted and unpermitted domestic water wells, springs, ponds and other water features downgradient of the release location, B. Sampling program to collect samples from the Guthrie well, Schultz well, and Janice Hunt spring utilizing the COGCC analytical suite (attached), no later than July 10, 2012 to evaluate possible impacts to wells and spring(s) after infiltration time. C. An additional sampling event for the 3 features is required by September 10, 2012. D. Water features identified in the well search shall be sampled when identified and again by September 10, 2012 if they are located between the release location and the northern edge of NESE Section 27 6S 92W 6th meridian. E. A comprehensive, interpretive report summarizing the investigation and results is due by October 15, 2012. 3. Provide list of downstream Davis Ditch and Dry Hollow users with contact dates and user response . 4. If COGCC analytical sampling results indicate an impact, additional sampling may be required. 5. Provide pipeline testing records.

I've attached the analytical suite I sent to our consultant.

I should have the official NOAV to email you late today.

If you have questions, please call my cell. I will be out tomorrow afternoon, but may be reachable by cell in the morning.

Thanks.

Linda Spry O'Rourke
Environmental Protection Specialist, Northwest Region
Colorado Oil & Gas Conservation Commission
707 Wapiti Court
Suite 204
Rifle, CO 81650

(970) 625-2497 Office
(970) 625-5682 Fax
(970) 309-3356 Cellular
linda.spryorourk@state.co.us

This email communication and any files transmitted with it may contain confidential and or proprietary information and is provided for the use of the intended recipient only. Any review, retransmission or dissemination of this information by anyone other than the intended recipient is prohibited. If you receive this email in error, please contact the sender and delete this communication and any copies immediately. Thank you.

<http://www.encana.com>