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From: **Eckman - DNR, Annie** <annie.eckman@state.co.us>

Date: Fri, Apr 24, 2015 at 11:40 AM

Subject: Fwd: Spill No. 2221630

To: Randall Ferguson <Randall.Ferguson@pdce.com>, CARRIE@caerusoilandgas.com

Cc: Adell Heneghan <Adell.Heneghan@pdce.com>, Alex Fischer - DNR <alex.fischer@state.co.us>

Puckett 242-36 ~ NESW S36-T6S-R97W ~ API #05-045-11046 ~ Spill # 2221630

Based on our review of information presented, it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or if ground water is found to be significantly impacted, then further investigation and/or remediation activities may be required at the site.

Note that during final pad reclamation, impacts associated with the 2011 flowback and produced water spill must be assessed, as insufficient data documenting delineation of the spill area was provided in the Notice of Completion Report.

The Sundry Form 4 has been approved (doc#[200430270](#)); a copy is attached for your records. The Notice of Completion Report has been uploaded to Spill Tracking #[2221630](#), and the Spill has been changed to closed status in the Colorado Oil & Gas Information System (doc #[200429131](#)). Please maintain a copy of this email as verification of No Further Action required.

Thanks

Ann C Eckman, PG
Environmental Protection Specialist



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RE: Puckett 242-36
05-045-11046
NESW 36 – T6S – R97W
Garfield County, CO

Alex:

The following information is provided for the subject spill:

12/12/2011 Leaking manifolds and piping on frac tanks at the subject location resulted in the release of approx.

250 bbls of produced water and flowback fluid; approx. 30 bbls was recovered.

12/21/2011 PDC submitted a Form 19 – Spill Release Report for the subject spill and assigned Spill #2221630; the impacted area was allowed to naturally attenuate.

4/18/2012 HRL Compliance Solutions, Inc. (HRL) conducted a site characterization of the impacted area which included a series of soil borings; also collected three background soil samples for arsenic analyses.

7/18/2012 HRL conducted a site assessment by advancing soil borings in the impacted area; collected confirmation soil samples for analyses.

Sept. 2012 Notice of Completion Report prepared by HRL (see attached); also contains Form 4 – Sundry Notice for background arsenic samples.

6/19/2013 Effective date on Form 10 – Change of Operator from PDC Energy (Operator #69175) to Caerus Piceance LLC (Operator #10456); Form 10 approved by COGCC on 10/10/2013

The Form 19 – Spill/Release Report is the only document in COGIS under this spill number. It is unclear why subsequent documents prepared after the Form 19 submittal are not available in COGIS. However, based on the information presented above and attachments to this e-mail, PDC requests a **No Further Action** determination relating to this spill/release event.

Your assistance in this matter is appreciated. Please call if there are any questions.

Regards,

Randall Ferguson | EHS Senior Compliance Specialist | PDC Energy, Inc. | O: [303-831-3904](tel:303-831-3904) | C: [303-570-8575](tel:303-570-8575) | F: [303-860-5838](tel:303-860-5838) | randall.ferguson@pdce.com



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