

- Forwarded message -----

From: **Eckman - DNR, Annie** <[annie.eckman@state.co.us](mailto: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](mailto:Randall.Ferguson@pdce.com)>, [CARRIE@caerusoilandgas.com](mailto:CARRIE@caerusoilandgas.com)

Cc: Adell Heneghan <[Adell.Heneghan@pdce.com](mailto:Adell.Heneghan@pdce.com)>, Alex Fischer - DNR <[alex.fischer@state.co.us](mailto: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**



P 303.894.2100 Ext 5124 | F 303.894.2109

1120 Lincoln Street, Suite 801, Denver, CO 80203

[annie.eckman@state.co.us](mailto:annie.eckman@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

**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](mailto:randall.ferguson@pdce.com)



*This email, including attachments, may include confidential and/or proprietary information, and may be used only by the person or entity to which it is addressed. Please do not read, copy or disseminate this communication unless you are the intended addressee. If you received this communication in error, please permanently delete and call (800) 624-3821 immediately and ask to speak to the sender of this communication. Also, please notify immediately via e-mail that you have received this message in error.*