



## Re: Sooner 10-28: spill tracking #2145522

Axelson - DNR, John <john.axelson@state.co.us>

Fri, Aug 16, 2013 at 11:09 AM

To: Rachel Eisterhold <reisterhold@foundationenergy.com>

Cc: James Milne - DNR <James.Milne@state.co.us>, Rick Allison - DNR <Rick.Allison@state.co.us>, OGCC EnviroScan - DNR <OGCC.EnviroScan@state.co.us>

Rachel,

On a different subject, I was trying to close out some old NOAVs recently. There was one issued to DOC in 2006 on the State 36-16 lease (Doc #1175574). Based on several follow up inspections it doesn't look like DOC ever did anything to complete the corrective actions, although there was a Form 27 submitted in the past (Rem #1833).

Could you take a look at the most recent inspection attached. If the corrective actions have not been completed, please have somebody perform the work required to bring the lease into compliance within the next 60-days. When everything has been completed, you can submit a Sundry Form 4, notice of work complete with a reference to the NOAV and Rem #. Provide soil disposal documentation for the oily waste, if applicable, and request closure of the NOAV & Rem or provide a plan for additional work if required.

Please give me a call if you have any questions. I appreciate your help to bring this to final resolution.  
John

### COGIS - NOAV Report

**Operator Information** [Related](#) [Docs by API](#) [Single Doc](#) [Docs under NOAV](#)

<b>DocNum:</b>	1175574	<b>Date Rec'd:</b>	3/22/2006
<b>Operator:</b>	DIVERSIFIED OPERATING CORPORATION	<b>Oper. No.</b>	24461
<b>Address:</b>	15000 W 6TH AVE STE 102 ATTN: TERRY J. CAMMON GOLDEN , CO 80401		
<b>Company Rep.</b>	TERRY CAMMON		
<b>Well Name/No.</b>	STATE 36-16		
<b>Location</b>	SESE 36 T8N R60W 6		
<b>Fac.ID:</b>	263494	<b>Fac.Type:</b>	WELL
<b>API number:</b>	05-123 -20908	<b>County</b>	WELD
<b>COGCC Rep:</b>	RANDALL FERGUSON	<b>Phone:</b>	( )

#### Alleged Violation:

**Date of Alleged Violation:** 3/15/2006

**Approx. time of violation:**

A FIELD INSPECTION WAS CONDUCTED OF THE SUBJECT FACILITY ON 3/15/06. THE PRODUCED WATER PIT WAS COMPLETELY COVERED WITH OIL. FREE OIL AND OILY SOIL WAS OBSERVED ADJACENT TO THE LOAD OUT VALVE. ADDITIONALLY, EVIDENCE WAS PRESENT INDICATING THAT TANK BOTTOMS HAVE BEEN DRAINED INTO AN UNAUTHORIZED PIT WITHIN THE BERM AREA. TANK BOTTOMS ARE CLASSIFIED AS OILY WASTE AND MAY ONLY BE TREATED OR DISPOSED OF IN ACCORDANCE WITH RULE 907.e.

#### Act, Order, Regulation, Permit Conditions Cited:

Rules 902.d., 902.h., 907.a.(1), 907.e.

#### Abatement or Corrective Action Required to be Performed by Operator

A COPY OF THE FIELD INSPECTION REPORT AND RELATED PHOTOS WERE SENT PREVIOUSLY. REMOVE OIL AND OILY VEGETATION AS SOON AS PRACTICABLE. NOTIFY COGCC STAFF WHEN THIS CORRECTIVE ACTION HAS BEEN COMPLETED. CLEAN UP OIL AND OILY SOIL ADJACENT TO LOAD OUT. CEASE DRAINING TANK BOTTOMS INTO BERM. SUBMIT A FORM 27 - SITE INVESTIGATION AND REMEDIATION WORKPLAN FOR THE CLOSURE OF THE UNAUTHORIZED PIT WITHIN THE BERM IN ACCORDANCE WITH RULE 905.a.

**Abatement or Corrective Action Required to be Completed by: 3/31/2006**

*This section to be completed by Operator when alleged violation is corrected*

<b>Company Rep:</b>	<b>Title:</b>
<b>Signature?</b>	<b>Date:</b> 3/22/2006 4:02:09 PM
<b>Company Comments:</b>	

<b>COGCC Signature? Y</b>	<b>Date:</b> 3/22/2006
<b>Resolution approved by:</b>	<b>Title:</b>

<b>Final Resolution</b>			
<b>Date</b>	<b>Case Closed?</b>	<b>Letter Sent?</b>	<b>COGCC person</b>

No Final data found.

John Axelson, P.G.  
Environmental Protection Specialist, Northeast Region  
Colorado Oil & Gas Conservation Commission

Phone: 720-929-2298  
Fax: 720-929-2275  
Cell: 303-877-9964

Cc. NOAV #1175574, Rem #1833 - Correspondence

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