

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402116561

Date Received:

07/23/2019

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

6 of 6 CAs from the FIR responded to on this Form

6 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10531
Name of Operator: VANGUARD OPERATING LLC
Address: 5847 SAN FELIPE #3000
City: HOUSTON State: TX Zip: 77057

Contact Name and Telephone:
Name:
Phone: () Fax: ()
Email:

Additional Operator Contact:

Contact Name	Phone	Email
<u>Fischer, Alex</u>		<u>alex.fischer@state.co.us</u>
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<u>Ghan, Scott</u>		<u>sghan@vnrllc.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 698100039
Inspection Date: 07/11/2019 FIR Submit Date: 07/15/2019 FIR Status:

Inspected Operator Information:

Company Name: VANGUARD OPERATING LLC Company Number: 10531
Address: 5847 SAN FELIPE #3000
City: HOUSTON State: TX Zip: 77057

LOCATION - Location ID: 335514

Location Name: JOLLEY-66S91W Number: 21NENW County:
Qtrqtr: NENW Sec: 21 Twp: 6S Range: 91W Meridian: 6
Latitude: 39.518638 Longitude: -107.561279

FACILITY - API Number: 05-045-00 Facility ID: 335514

Facility Name: JOLLEY-66S91W Number: 21NENW
Qtrqtr: NENW Sec: 21 Twp: 6S Range: 91W Meridian: 6
Latitude: 39.518638 Longitude: -107.561279

CORRECTIVE ACTIONS:

1 CA# 127019

Corrective Action: Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.

Date: 08/15/2019

Response: CA COMPLETED

Date of Completion: 07/12/2019

Operator Comment: The small and localized area of stained ballast material within the lined secondary containment was removed and the equipment was inspected for proper operation and mechanical condition.

COGCC Decision: _____

COGCC Representative: _____

2 CA# 127020

Corrective Action: Remove and properly dispose of oily waste, per Rule 907.e. (ASTs) Date: 08/15/2019

Response: CA COMPLETED Date of Completion: 07/12/2019

Operator Comment: The small and localized area of stained ballast material within the lined secondary containment was removed and the equipment was inspected for proper operation and mechanical condition.

COGCC Decision: _____

COGCC Representative: _____

3 CA# 127021

Corrective Action: Remove and properly dispose of oily waste, per Rule 907.e. (wellheads) Date: 08/15/2019

Response: CA COMPLETED Date of Completion: 07/12/2019

Operator Comment: Small stains in well head cellars were associated with grease fittings on the casing valves. High ambient temperatures can cause grease to bleed from the fittings, but are contained within the cellar. The very small and localized stained areas have been removed from the cellars.

COGCC Decision: _____

COGCC Representative: _____

4 CA# 127022

Corrective Action: Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. (wellheads) Date: 08/15/2019

Response: CA COMPLETED Date of Completion: 07/12/2019

Operator Comment: Small stains in well head cellars were associated with grease fittings on the casing valves. High ambient temperatures can cause grease to bleed from the fittings, but are contained within the cellar. The valve greasing events are associated with the valve maintenance and inspection program to ensure proper operation.

COGCC Decision: _____

COGCC Representative: _____

5 CA# 127023

Corrective Action: Comply with Rule 603.f. Date: 07/25/2019

Response: CA COMPLETED Date of Completion: 07/17/2019

Operator Comment: The items mentioned have been removed from the secondary containment

COGCC Decision: _____

COGCC
Representative:

6 CA# 127193

Corrective Action: Remove and properly dispose of fluids. Submit documentation of type, estimated volume, and disposal of fluid released via an FIRR. Operator shall also demonstrate liner integrity.

Date: 08/11/2019

Response: CA COMPLETED

Date of Completion: 07/12/2019

Operator
Comment:

The observed stormwater was removed from the lined secondary containment via a vacuum truck. The truck removed approximately 3 barrels of stormwater during this event and the stormwater accumulation within the lined containment is associated with documented precipitation events occurring in late June and early July. A copy of the load ticket has been attached for reference. Periodic accumulations of stormwater within lined secondary containments are not uncommon and is an indication of liner integrity and proper function of the system.

The observed red discoloration of the stormwater within the containment is likely associated with algae growth. The presence of algae on the gravel ballast material is common in last Spring and early Summer. The red discoloration within the containment was observed to only be on the surface of the gravel and was easily removed when disturbed. The discoloration did not extend below the visible surface of the ballast material. These observations were discussed with Steven Arauza during a recent phone conversation regarding this inspection and the associated COAs. There were no indications of hydrocarbon sheen, hydrocarbon staining or hydrocarbon odor within the secondary containment or on the surface of the observed stormwater. These same observations were also made by COGCC staff during the inspection and are noted in the inspection report. The observed fluid within the load line containment was removed and there was no visible evidence that any fluid had been released from the load line containment or that this containment was not operating as designed. There are no indications to question the integrity of the liner associated with the tank battery secondary containment system. The system is holding stormwater as observed by COGCC staff and documented in the inspections photographs. There was also no indication of saturated soil beyond the containment wall anywhere along the perimeter of the secondary containment or any visible discoloration or staining to suggest a possible liner integrity issue.

COGCC Decision:

COGCC
Representative:

OPERATOR COMMENT AND SUBMITTAL

Comment: Please route to Steven Arauza.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Scott Ghan

Signed:

Title: Senior EHS Specialist

Date: 7/23/2019 9:11:01 AM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number **Description**

402118184	Load Ticket
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Total Attach: 1 Files