

1120 Lincoln Street, STE 801
Denver, CO 80203

August 22, 2019

Branden Hayes, Environmental Specialist
DCP Operating Company LP
370 17th Street - Suite 2500
Denver, CO 80202
Delivered via email

Dear Mr. Hayes,

On May 16th, 2019 DCP Operating Company LP (DCP) met with the Colorado Oil and Gas Conservation Commission (COGCC) Environmental team to discuss the multiple outstanding spill and remediation projects that required updates in accordance with 906.a. At the time of the meeting there were 45 unresolved incidents. DCP assured the COGCC that they would provide updates and bring their reporting into compliance. It has been more than 90 days since the meeting. DCP has provided updates on eight remediations and eight spills. COGCC administratively closed three of these projects through review of historical records.

While the COGCC appreciates the response for these 16 projects, DCP still has 10 overdue remediations (Table 1) and 21 overdue spills (Table 2) that have not received any updates. Additionally, two Conditions of Approval (COA) deadlines have passed with no response from DCP.

In accordance with 901.c the COGCC is requiring DCP to submit supplemental information via eForm 19 or 27, as applicable, within 10 days for projects that have been categorized as high priority and 30 days for all other aging projects. Please review the details and due dates in the attached tables and contact the area EPS with any questions regarding these unresolved spills and remediation projects.

Regardless of the information supplied in the Form 19 Supplemental updates, all current open spills must be closed within 45 days of the last submittal. If DCP cannot justify closure within the 45 days, DCP shall submit an eForm 27 Workplan and close the associated spill referencing the remediation project number within the 45 day timeline.

Due to the consistent late submittals from DCP, all remediation projects are required to have quarterly reporting. Once DCP has provided the COGCC with the required project updates, DCP shall continue to provide the COGCC with quarterly updates on all remediation projects until site investigation and remediation efforts are completed unless directed otherwise by COGCC via COA deadlines.

If DCP fails to deliver updates via eForm on or before the Corrective Action Deadline Dates stated in Table 1 and Table 2 COGCC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

Sincerely,



John E. Axelson, P.G.
Acting Environmental Manager

Attachments:

Table 1: Open Remediations

Table 2: Open Spills

CC:

Chandler Cole- DCP

Stephen Weathers- DCP

Keith Warren- DCP

Jeremy Ferrin- COGCC Enforcement Supervisor

Rick Allison- COGCC Environmental Protection Specialist

Chris Canfield- COGCC Environmental Protection Specialist

Bob Chesson- COGCC Environmental Protection Specialist

Peter Gintautas- COGCC Environmental Protection Specialist

Nikki Graber- COGCC Environmental Protection Specialist

Kari Oakman- COGCC Environmental Protection Specialist

Table 1
Open Remediations

Date Submitted	Document #	Project Number	Facility ID	Lat	Long	TWN	RNG	Area EPS	Reporting Frequency	Last Submittal	Notes	eForm 27 Due
6/15/2016	200439765	9698	441101	40.114	-104.873041	2n	67w	Peter Gintautas	Quarterly	8/14/2016	Pipeline release. 6MW.	10 days
9/13/2016	200440188	9824	446365	40.475249	-104.594872	6n	64w	Rick Allison	Quarterly	11/18/2016	Pipeline release. 6MW. COA letter (11/29/2016) requires additional monitoring wells. Free produced was present, EFR and monitoring approved with the requirement for additional MW	10 days
10/30/2017	401444314	10664	450671	40.476705	-104.598133	6n	64w	Rick Allison	Quarterly	3/19/2018	Pipeline release. 5MW - additional wells required for POC Feb 2017	10 days
1/22/2019	401905697	12393	458322	40.320118	-104.67383	4n	65w	Nikki Graber	Quarterly	4/30/2019	Pipeline leak. 5 groundwater monitoring wells to be installed. COA to preform work within 45 days of Form 27 submittal	10 days
2/22/2019	401940170	12644	255957	40.363785	-104.72933	5n	66w	Nikki Graber	Quarterly	7/11/2019	Contamination from produced water sump. 8MW. Additional MW required for POC. COA for Workplan for active remediation by 8/18/2019. Sensitive area.	10 days
7/13/2000	848597	469		40.087829	-104.883628	2n	67w	Peter Gintautas	Quarterly	2/22/2019	Spindle gas plant site.	30 days
8/20/2015	200437203	9251	441725	40.528161	-104.696969	7n	65w	Rick Allison	Quarterly	1/3/2019	Pipeline release. 12MW.	30 days
11/17/2015	200437992	9353	440770	40.176595	-104.489837	3n	63w	Bob Chesson	Quarterly	11/17/2015	Pipeline release. 12MW.	30 days
3/2/2018	401561335	11079	452142	40.145327	-104.793825	2n	66w	Peter Gintautas	Quarterly	1/24/2019	Pipeline release. Request for closure removed. Soils above 910-1, variance not approved.	30 days
4/16/2019	402004215	13272	463819	40.292285	-104.941832	4n	68w	Chris Canfield	Quarterly	6/18/2019	Pipeline release. Site investigation in progress. 15MW- additional wells to be installed.	30 days
10/30/1995	883000	13	120044	40.190026	-104.488468	3n	63w	Bob Chesson	Quarterly	4/29/2019	Compressor station impacts identified during a due diligenge. 12MW.	30 days
11/30/2001	1104838	766	422083	40.0987	-104.9602	2n	68w	Chris Canfield	Quarterly	2/26/2002	West spindle compressor station. Subsurface investigation	30 days
2/1/2019	401913362	12423	460526	40.1289	-104.8089	2n	66w	Peter Gintautas	Quarterly	7/15/2019	Pipeline leak. 5 MW	10/15/2019
4/1/2016	200439292	9592	445079	40.116722	-104.386786	2n	63w	Bob Chesson	Quarterly	1/7/2019	Condensate leak. Not all impacted soil could be excavated - treated on site. Summary report to be provided upon completion of Sept. 2019 soil boring investigation.	11/14/2019
12/2/2015	200438200	9380	442806	40.43888	-104.84129	6n	67w	Rick Allison	Quarterly	8/19/2019	Pipeline release. 12MW. Supplemental Form 27 in process.	11/19/2019
3/8/2017	401228571	10088	449221	40.46687	-104.75426	6n	66w	Rick Allison	Quarterly	8/19/2019	Anderson Pipeline leak. 4MW proposed. Supplemental Form 27 in process. Due date reflects quarterly reporting frequency; does not supercede any dated COA's.	11/19/2019

Table 2
Open Spills

Date Submitted	Document #	Facility ID	Lat	Long	TWN	RNG	Name	Area EPS	Supplemental Submitted	Notes	eForm 19 Due Date
9/5/2014	400680378	439643	40.094	-104.934	2n	67w	SPILL/RELEASE POINT	Peter Gintautas	9/5/2014	Inspected 11/1/16. CA to file supplemental 19 with required spill documentation by 11/11/16. No further follow up.	10 days
9/22/2015	400903184	443265	40.59872	-104.183456	7n	61w	SPILL/RELEASE POINT	Rick Allison	6/21/2016	On last submittal request for closure was removed w comment: COGCC Environmental Staff removed the Request for Closure. The Operator is directed submit a new Form 19 Supplemental Report that includes the completed. Corrective Actions Report and another Request for Closure. COGCC emailed the Operator on 6/21/2016. No follow up from operator.	10 days
12/18/2015	400957315	444395	40.024319	-104.553269	1n	64w	SPILL/RELEASE POINT	Bob Chesson	1/7/2016	In 19 supplemental soil remediation was in progress. Soil samples taken but analytical not reported.	10 days
11/9/2016	401146331	448317	40.2324	-104.7975	3n	66w	SPILL/RELEASE POINT	Peter Gintautas	No	Only initial submitted. 19 says initial site investigation was preformed, no analytical submitted. COA to provide documentation for closure or form 27 by 2/9/17. No further follow up	10 days
11/6/2017	401451035	452964	40.031948	-105.021806	1n	68w	Sater 3 inch Pipeline Release	Bob Chesson	No	Only initial submitted. 19 says site investigation will be scheduled to determine extent of soil contamination. No further follow up.	10 days
2/13/2018	401544230	454046	40.693087	-103.837102	8n	58w	Lily 5-2 Launcher	Rick Allison	8/10/2018	Closure request removed. COA (8/17/218): Unchecked closure request. COA from Initial Form 19 have not been addressed. No attachment was provided on this Form 19. (Original COA = Operator shall provide a detailed root cause for the release on a Supplemental Form 19. Operator shall also provide and explanation for the delay in release reporting.	10 days
3/28/2018	401588978	454564	40.267356	-104.735617	4n	66w	Mewbourn CND Release	Peter Gintautas	3/28/2018	No analytical attached	10 days
10/23/2018	401806989	458322	40.47123	-104.62894	6n	65w	Knaub 9-13G Pipeline Release	Rick Allison	11/5/2018	Pipeline leak in gas gathering line. COA for Form 27 for groundwater investigation by 1/22/19.	10 days
11/15/2013	2146961	422072	40.190551	-104.487985	3n	63w	ENTERPRISE COMPRESSOR STATION	Bob Chesson	NA	Only initial Form 19; No analytical attached.	30 days
12/2/2013	2147134	412250	40.090538	-104.88492	2n	67w	SPINDLE GAS PLANT	Peter Gintautas	NA	Only initial Form 19; No analytical attached.	30 days
12/20/2013	2147304	120464	40.27663	-104.5476	4n	64w	MARLA COMPRESSOR STATION	Bob Chesson	NA	Soil samples submitted. No request for closure found	30 days
6/12/2014	400626192	437579	40.5408	-104.7131	7n	65w	SPILL/RELEASE POINT	Rick Allison	No	Only initial Form 19; No analytical attached.	30 days
7/3/2014	400639535	438036	40.392992	-104.9263	5n	67w	SPILL/RELEASE POINT	Bob Chesson	No	Only initial Form 19; Form 19 reports soil samples were taken. No analytical attached.	30 days
4/17/2015	400826909	441536	40.2767	-104.5475	4n	64w	SPILL/RELEASE POINT	Bob Chesson	4/27/2015	Soils sampled but analytical not reported.	30 days
11/22/2016	401154239	448396	40.30612	-104.646168	4n	65w	SPILL/RELEASE POINT	Nikki Graber	No	Only initial submitted. 19 says site investigation will be scheduled. Env comment to proved supplemental in 10 days. No further follow up	30 days
1/5/2017	401178363	448887	40.53065	-104.75858	7n	66w	Eaton Gas Plant	Rick Allison	No	Only initial submitted. 19 says site investigation will be scheduled to determine extent of soil contamination. COA for supplemental by 1/15/17	30 days
2/13/2017	401209002	449221	40.46687	-104.75426	6n	66w	Anderson 3"	Rick Allison	2/17/2017	Work proceeding under an approved Form 27	30 days
3/16/2017	401235312	449651	40.133323	-104.87346	2n	67w	Parker 16-15	Peter Gintautas	No	Analytical provided. COA: Provide documentation justifying closure request within 90 days of release via supplemental form 19. If investigation and remediation require further actions beyond 90 days then submit form 27 for approval within 90 days of spill (02June2017). No further follow up.	30 days
5/19/2017	401288225	450671	40.0869	-105.017	1n	68w	Weber 4-19 Pipeline Release	Rick Allison	No	Work proceeding under an approved Form 27	30 days
1/19/2018	401520046	453781	40.152408	-104.815083	2n	66w	Troyer 4" Pipeline Release	Peter Gintautas	No	COA: Provide documentation justifying closure request within 90 days of release via supplemental form 19. If investigation and remediation require further actions beyond 90 days then submit form 27 for approval within 90 days of spill (19April2018). Env. Insp 2/7/2018 asks for supplemental 19 by 2/16/18. No follow up from operator.	30 days
4/4/2019	401997249	463819	40.292285	-104.941832	4n	68w	CR42 and CR13	Chris Canfield	5/21/2019	Pipeline condensate release. COA for 19s for closure	30 days
7/3/2014	400639548	437972	40.124957	-104.338475	2n	62w	SPILL/RELEASE POINT	Bob Chesson	8/16/2019	Form 19 said soil samples taken to delineate impacts. No analytical attached. Supplemental pending approval.	10/5/2019
6/18/2019	402078486	465242	40.03678	-104.467359	1n	63w	South Booster 6" pipeline Release	Bob Chesson	6/28/2019	3rd party line strike - condensate release	10/5/2019