

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402437959

Date Received:

07/06/2020

Spill report taken by:

Spencer, Stan

Spill/Release Point ID:

439249

SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 906.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

OPERATOR INFORMATION

Name of Operator: <u>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers
Address: <u>1401 SEVENTEENTH STREET #1401</u>		Phone: <u>(970) 263-3641</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Joan Proulx</u>		Email: <u>jproulx@laramie-energy.com</u>

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 400703360

Initial Report Date: 10/07/2014 Date of Discovery: 10/04/2014 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR SESW SEC 29 TWP 6S RNG 97W MERIDIAN 6

Latitude: 39.489190 Longitude: -108.248070

Municipality (if within municipal boundaries): _____ County: GARFIELD

Reference Location:

Facility Type: _____ Facility/Location ID No 417559

Spill/Release Point Name: _____ Well API No. (Only if the reference facility is well) 05- -

No Existing Facility or Location ID No.

Fluid(s) Spilled/Released (please answer Yes/No):

Was one (1) barrel or more spilled outside of berms or secondary containment? Yes

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

Were Five (5) barrels or more spilled? Yes

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): <u>0</u>	Estimated Condensate Spill Volume(bbl): <u>0</u>
Estimated Flow Back Fluid Spill Volume(bbl): <u>0</u>	Estimated Produced Water Spill Volume(bbl): <u>>=5 and <100</u>
Estimated Other E&P Waste Spill Volume(bbl): <u>0</u>	Estimated Drilling Fluid Spill Volume(bbl): <u>0</u>

Specify: _____

Land Use:

Current Land Use: OTHER Other(Specify): Rangeland

Weather Condition: Clear

Surface Owner: OTHER (SPECIFY) Other(Specify): Oxy Private

Check if impacted or threatened by spill/Release (please answer Yes/No to all that apply):

Waters of the State Residence/Occupied Structure Livestock Public Byway Surface Water Supply Area

As defined in COGCC 100-Series Rules

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

At approximately 11:30AM Sunday, October 5th, 2014, a release of produced water from a corroded piece of piping on the filter pot manifold assembly at the Oxy Central Water Handling Facility was discovered. The piping had lined secondary containment that held a majority of the spilled produced water. However, the secondary containment's capacity was reached and a portion of the produced water continued onto the working surface of the location. Oxy investigated and quantified the release at ~31 bbls of produced water. Oxy recovered ~ 24 bbls of produced water and estimates that the remaining ~7bbls was absorbed into the location's surface. The leak and subsequent release was contained within the Centralized Water Handling facility boundary. The spilled liquids were removed from the secondary containment via vac truck immediately after the discovery.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
10/6/2014	COGCC	Stan Spencer	970-6252497	none
10/6/2014	Garfield County	Kirby Wynn	970-6255905	none

Was there a Grade 1 Gas Leak? Yes No

If YES, enter the Document Number of the Grade 1 Gas Leak Report Form 44: _____

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? Yes No

If YES, enter the Document Number of the Initial Accident Report, Form 22: _____

Was there damage during excavation? Yes No

If YES, was CO 811 notified prior to excavation? Yes No

SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 07/06/2020

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	<u>0</u>	<u>0</u>	<input type="checkbox"/>
CONDENSATE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
PRODUCED WATER	<u>31</u>	<u>24</u>	<input type="checkbox"/>
DRILLING FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
FLOW BACK FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
OTHER E&P WASTE	<u>0</u>	<u>0</u>	<input type="checkbox"/>

specify: _____

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply) Soil Groundwater Surface Water Dry Drainage Feature

Surface Area Impacted: Length of Impact (feet): 160 Width of Impact (feet): 4

Depth of Impact (feet BGS): _____ Depth of Impact (inches BGS): _____

How was extent determined?

The released fluids within secondary containment were removed by a vac truck which gauged the liquid once it was loaded. The fluids that spilled out of containment left a visible spill path on the surface of the location. Dimensions from that spill trail were inputted into an Oxy spill calculator to quantify the released produced water.

Soil/Geology Description:

Happle very channery sandy loam, 3 to 12 percent slopes

Depth to Groundwater (feet BGS) 80 Number Water Wells within 1/2 mile radius: 4

If less than 1 mile, distance in feet to nearest Water Well 156 None Surface Water 300 None
 Wetlands _____ None Springs _____ None
 Livestock _____ None Occupied Building 2240 None

Additional Spill Details Not Provided Above:

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 07/06/2020

Root Cause of Spill/Release Equipment Failure

Other (specify) _____

Type of Equipment at Point of Spill/Release: Manifold Piping

If "Other" selected above, specify or describe here:

Describe Incident & Root Cause (include specific equipment and point of failure)

At approximately 11:30AM Sunday, October 5th, 2014, a release of produced water from a corroded piece of piping on the filter pod manifold assembly at the Oxy Central Water Handling Facility was discovered. The piping suffered two 1/4" pinhole leaks underneath piping insulation. The piping had lined secondary containment that held a majority of the spilled produced water. However, the secondary containment's capacity was reached and a portion of the produced water continued onto the working surface of the location. Oxy investigated and quantified the release at ~31 bbls of produced water. Oxy recovered ~ 24 bbls of produced water and estimates that the remaining ~7bbls was absorbed into the location's surface. The leak and subsequent release was contained within the Centralized Water Handling facility boundary. The spilled liquids were removed from the secondary containment via vac truck immediately after the discovery.

Describe measures taken to prevent the problem(s) from reoccurring:

The corroded piping was welded to seal the area around the pinholes. All uncoated piping with the filter pot manifold assembly will be replaced with corrosion resistant (coated steel) or non-corrodible material.

Volume of Soil Excavated (cubic yards): 0

Disposition of Excavated Soil (attach documentation) Offsite Disposal Onsite Treatment
 Other (specify) _____

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: Corrective Actions Completed (documentation attached)

Work proceeding under an approved Form 27

Form 27 Remediation Project No: _____

OPERATOR COMMENTS:

Attached is an FAQ 31 and FAQ 32 letter to address the exceedances in Arsenic, SAR and EC.

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

Signed: _____ Print Name: Joan Proulx

Title: Regulatory Analyst Date: 07/06/2020 Email: jproulx@laramie-energy.com

COA Type	Description
	<p>Under Describe measures taken to prevent the problem(s) from reoccurring, the operator states that "All uncoated piping with the filter pot manifold assembly will be replaced with corrosion resistant (coated steel) or non-corrodible material."</p> <p>Were these repairs ever made in response to this 2014 spill? Operator shall submit documentation of the repairs made in response to Spill/Release Point iD #439249 via a Supplemental eForm 19.</p>
	<p>Within 45 days of approval of this report (i.e. no later than September 6, 2020), Operator shall submit an Initial eForm 27 to delineate the vertical extent of produced water impacts at the CENTRAL WATER HANDLING FACILITY (Facility ID #417559) and CC 0629-01 Pad (Location ID #323887) in the areas represented by the flow path resulting from Spill/Release ID #439249 including the Tier 1N, Tier 1 E, and Tier 2 W sample locations described in the Olsson Associates Spill Characterization and Closure Report dated November 11, 2014 (doc #402437968).</p>

Attachment Check List

Att Doc Num	Name
402437959	SPILL/RELEASE REPORT(SUPPLEMENTAL)
402437968	ANALYTICAL RESULTS
402437969	ANALYTICAL RESULTS
402437970	OTHER
402437971	AERIAL PHOTOGRAPH
402449602	FORM 19 SUBMITTED

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	<p>The COGCC does not approve of the operator's request for closure at this time. See COA above for additional requirements. Operator's Request for Closure response on this report has been removed by COGCC due to the inability to approve of the operator's request.</p> <p>This eForm 19 is approved for information purposes.</p>	07/23/2020
Environmental	<p>The operator's attached request for relief from Table 910-1 for EC and SAR under FAQ 32 (doc #402437970) is not approved at this time due to the facts that EC and SAR exceedances remain at the surface of the pad and that the operator has not demonstrated vertical delineation of Table 910-1 exceedances for inorganic constituents (EC, pH, and SAR).</p> <p>Per Rule 910.b.(3).B, "samples shall be collected from areas most likely to have been impacted, and the horizontal and vertical extent of contamination shall be determined. The number and location of samples shall be appropriate to the impact."</p> <p>This spill report indicates that 7 bbls of produced water "was absorbed into the location's surface." The attached Spill Characterization and Closure Report (doc #402437968) describes the collection of "five surface soil samples" along the spill path. The analytical results document Table 910-1 exceedances for EC and SAR at sample IDs Tier 2 W, Tier 1 E, and Tier 1 N. Additional remediation is required for operator to characterize vertical extents of subsurface soil impacts pursuant to Rule 910.b.(3).B & D.</p> <p>See COA above.</p>	07/16/2020

Total: 2 comment(s)