

State of Colorado Oil and Gas Conservation Commission

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Document Number:

402478618

Date Received:

09/01/2020

Spill report taken by:

Araza, Steven

Spill/Release Point ID:

466667

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>
Contact Person: <u>Joan Proulx</u>		Mobile: <u>()</u>
		Email: <u>jproulx@laramie-energy.com</u>

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 402142236

Initial Report Date: 08/13/2019 Date of Discovery: 08/12/2019 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR NWSE SEC 31 TWP 7S RNG 97W MERIDIAN 6Latitude: 39.399015 Longitude: -108.260245Municipality (if within municipal boundaries): _____ County: GARFIELD

Reference Location:

Facility Type: OIL AND GAS LOCATION☒ Facility/Location ID No 421296Spill/Release Point Name: 28-10 Off load Facility☐ 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? No

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

Estimated Oil Spill Volume(bbl): 0Estimated Condensate Spill Volume(bbl): 0Estimated Flow Back Fluid Spill Volume(bbl): 0Estimated Produced Water Spill Volume(bbl): >=1 and <5Estimated Other E&P Waste Spill Volume(bbl): 0Estimated Drilling Fluid Spill Volume(bbl): 0Specify: Approx 120 gallons or about 3 bbls released

Land Use:

Current Land Use: NON-CROP LAND

Other(Specify): _____

Weather Condition: Dry, 90 deg fSurface Owner: FEDERAL

Other(Specify): _____

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):

During fluid transfer from Cascade Creek to this location Laramie staff observed the release of fluids. Transfer was shut-off/terminated. No fluids left the boundary of the location. The fluid was absorbed by the soil almost immediately, no fluids were recovered. Estimate of volume released is based on the area occupied by the spill. Area is estimated to be 0.5 inches in depth, 3 feet wide and 150 feet long. Soil sampling, analysis and additional delineation will be conducted on August 13 or 14.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
8/13/2019	GARCO LGD	Kirby Wynn	-	Acknowledged
8/13/2019	BLM	Jim Byers	970-3192532	Acknowledged
8/13/2019	BLM	Scott Hall	970-2443009	Acknowledged

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: 08/31/2020		
FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	3	0	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<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): 120 Width of Impact (feet): 3

Depth of Impact (feet BGS): 4 Depth of Impact (inches BGS): _____

How was extent determined?

Horizontal delineation determined by visual inspection from field employees and sampling contractor. Vertical delineation determined by sampling results.

Soil/Geology Description:

NRCS Map Unit Symbol 44

Number Water Wells within 1/2 mile radius: 1

If less than 1 mile, distance in feet to nearest

Water Well	1289	None	<input type="checkbox"/>
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Surface Water	311	None	<input type="checkbox"/>
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Wetlands ☐ None ☒None ☒

Livestock None ☒

Occupied Building ☐ None ☒

Additional Spill Details Not Provided Above:

CORRECTIVE ACTIONS

#1	Supplemental Report Date:	08/31/2020
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Root Cause of Spill/Release	Corrosion
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Other (specify) _____

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

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

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

During fluid transfer from Cascade Creek to the Logan Trail 28-10 Off-Loading Facility, staff observed the release of fluids. Transfer was immediately shut-off/terminated. The fluid was absorbed by the soil almost immediately; no fluids were recovered. The leak was due to a hole in the 4" carbon steel line.

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

The section of carbon steel line with the hole was replaced. The impacted soil was scraped up with a trackhoe and sent to Greenleaf.

Volume of Soil Excavated (cubic yards): 3

Disposition of Excavated Soil (attach documentation) ☒ Offsite Disposal ☐ Onsite Treatment

☐ Other (specify) _____

Volume of Impacted Ground Water Removed (bbbls): 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 a letter for FAQ 31 and FAQ 32 to address Arsenic and SAR.

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: 09/01/2020 Email: jproulx@laramie-energy.com

<u>COA Type</u>	<u>Description</u>
	Based on 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 surface and/or ground water is found to be impacted, then further investigation and/or remediation activities will be required at the site.

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402478618	SPILL/RELEASE REPORT(SUPPLEMENTAL)
402478663	ANALYTICAL RESULTS
402478664	ANALYTICAL RESULTS
402478665	ANALYTICAL RESULTS
402478666	DISPOSAL MANIFEST
402478667	DISPOSAL MANIFEST
402478670	SITE MAP
402478671	SITE MAP
402478673	ANALYTICAL RESULTS
402478674	ANALYTICAL RESULTS
402478676	SITE MAP
402478677	OTHER
402485954	FORM 19 SUBMITTED

Total Attach: 13 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Sample ID 28-10: POR 4' documents benzene, SAR, and EC exceedances at 4' depth at the point of release and Sample ID 28-01:SI 0-8" documents a SAR exceedance along the flow path. Attachment #402478673 indicates that these locations were re-sampled at 6' depth on 4/10/2020 at sample IDs LT 28-10 SS1-SS3.	09/10/2020
Environmental	Attached documents #402478666 and #402478667 are labeled as DISPOSAL MANIFESTs, but are actually ANALYTICAL RESULTS.	09/10/2020
Environmental	<p>Docs #402478674, #402478664, and #402478673 document a SAR exceedance of 15.9 at 6' depth (sample ID LT 28-10 SS2) and an arsenic exceedance (13.2 mg/kg) at the surface (0-4") at sample ID 28-10: S2 0-4".</p> <p>Based on the depth of sample ID LT 28-10 SS2, the COGCC conditionally approves of the operator's request to address the SAR exceedance per FAQ 32.</p> <p>Based on analytical results provided for a background sample (doc #402478667), the COGCC conditionally approves of the operator's request for consideration of arsenic background concentrations in exceedance of Table 910-1.</p>	09/09/2020
Environmental	<p>F19s doc #402147580 included a COA for operator to revise estimate for depth of impact in inches and feet BGS. This report does not list any depth of impact, yet states "vertical delineation determined by sampling results." This value cannot be zero, as soil sampling confirms inorganics, arsenic, and benzene impacts from 4 inches to 6 feet in depth.</p> <p>The depth of the impacted area has been revised to 4 feet BGS on this form by the COGCC.</p> <p>Note: future eForm 19 submittals for confirmed soil impacts cannot have depth values left blank.</p>	09/09/2020
Environmental	Supplemental Spill/Release Report doc #402147580 was approved on 8/23/2019 with a corrective action for operator to submit documentation of August 13, 2019 sampling event via a Supplemental eForm 19. The required documentation was not received from the operator until September 1, 2020, though the records indicate that a sampling event took place on 4/10/2020. Per Rule 906.a., Operators shall investigate, clean up, and document impacts resulting from spills/releases as soon as practicable.	09/08/2020

Total: 5 comment(s)