



Fwd: Caerus Historic Project Inquiry – COGCC Document # 2606065 L34

Araza - DNR, Steven <steven.arauza@state.co.us>

Fri, Dec 17, 2021 at 1:38 PM

To: Alex Fischer - DNR <alex.fischer@state.co.us>, Jim Hughes - DNR <jimo.hughes@state.co.us>

Caerus Spill #2606065

Steven J. Araza, P.G.
Environmental Protection Specialist



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He/Him

----- Forwarded message -----

From: **Blair Rollins** <brollins@caerusoilandgas.com>

Date: Fri, Mar 26, 2021 at 8:00 AM

Subject: Caerus Historic Project Inquiry – COGCC Document # 2606065 L34

To: Araza - DNR, Steven <steven.arauza@state.co.us>

Cc: Brett Middleton <bmiddleton@caerusoilandgas.com>

Steven,

I have prepared this email to provide you with an update and request guidance concerning a historical spill project that needs to be addressed for closure. The project is associated with the L34 Well Pad (COGCC Location ID 334916) and the attached Form 19 Document # 2606065.

The 20-barrel (bbl) condensate release occurred on 04/03/2010 when a water hauler failed to close the frost-free valve completely after pulling down the produced water in a production tank. After completing the water transport, the employee returned to the location, discovered the leak, closed the ball valve on the tank manifold, and reported the release. All fluids were contained within the lined steel berm secondary containment of the tank battery. A vacuum truck was able to recover all 20 bbl of the released fluids. The historical operator of the location reported intent to conduct a hot oil treatment within the secondary containment to remove remaining material and staining following initial cleanup actions. No samples associated with this release were collected. Since the release, the COGCC has conducted and documented seven (7) site inspections at the location. These inspection document numbers are as follows:

1 – 659700080

2 – 670200671

3 – 666800777

4 – 666802734

5 – 689301671

6 – 694900610

7 – 700702400

No staining or deficiencies associated with the tank battery containment were noted during a 2/12/2012 inspection (Document # 659700080). A Corrective Action was issued during a 2013 inspection (Document # 670200671) for slow drips at three bull plugs on the condensate tanks resulting in stained gravel within the secondary containment. A Corrective Action was issued during an 8/5/2018 inspection (Document # 689301671) for oil staining within the tank battery secondary containment. A FIR Resolution Form describing the completion of Corrective Action (Document # 401777347) was approved by the COGCC on 10/4/2018. A COGCC follow-up inspection (Document # 689301903) was completed on 9/13/2018, confirming the Corrective Action had been satisfied. An additional inspection in 2019 did not note deficiencies associated with the tank battery containment or surface staining in the vicinity of the tank battery. All inspections can be found in the COGIS database using COGCC Location ID 334916.

Based on the initial response to the release and the series of documented COGCC inspections, this spill was successfully remediated and should be closed. Any additional investigation of the release does not seem reasonable or necessary based on the fact that sampling of the area will be conducted during the required COGCC Rule 911.a.(4) site investigation at the time of facility decommissioning and final reclamation.

Please let me know if you agree with Caerus' assessment and approach to administratively close the spill within secondary containment which occurred in 2012.

Thank you,

Blair Rollins

Environmental Specialist

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