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## L26NW historic spill (Doc # 2608641)

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**Blair Rollins** <brollins@caerusoilandgas.com>  
To: Jim Hughes - DNR <jimo.hughes@state.co.us>  
Cc: Brett Middleton <bmiddleton@caerusoilandgas.com>

Fri, Jan 21, 2022 at 8:58 AM

Hi Jim,

I am sending this email to provide you with an update and request guidance concerning a historic spill project that needs to be addressed for closure. The project is associated with the L26NW Well Pad (COGCC Location ID 383338) and the attached Form 19 Document # 2608641, which predates the eForm process.

The 45 barrel produced water release occurred on 8/13/2010 when a frac tank overfilled due to improper gauging and monitoring activities during pre-frac pump priming. The spill was immediately identified and water trucks were able to recover 40 barrels of the spilled water on location. The remaining impacted material (soil and gravel) was stockpiled on the surface during interim reclamation, and was reapplied to the new working surface or reused at another location. The spill location is found within the interim reclamation area found on the north side of the well pad. Since the release, the COGCC has conducted and documented ten (10) site inspections at the location. These inspection document numbers are as follows:

Inspection Doc #	Date
670200572	6/14/2013
666800162	10/8/2014
666801586	10/29/2015
666802495	8/17/2016
666803416	7/27/2017
689300754	3/30/2018
689303168	2/6/2019
694900898	12/5/2019
700701673	10/13/2020
700702839	6/2/2021

None of these inspections note deficiencies associated with the interim reclamation area or staining identified on the surface of the well pad due to this release. A corrective action was issued during an inspection on 6/14/2013 (Doc # 670200572) to clean up stained soil found at the scrubber pot due to scrubber pot blowouts. All other inspections on the location occurred after this date, with no additional corrective actions noted. All inspections can be found on the COGIS database using COGCC Location ID 383338.

Based on the initial response to the release, the series of documented inspections at the site, the unknown disposition of remaining soil and gravel scraped up and reapplied elsewhere, and the spill release occurring within the interim reclamation area, Caerus requests closure of this spill. Caerus proposes to defer investigation and sample analysis within the area of the well pad until the required COGCC Rule 911.a.(4) site investigation during facility decommissioning and final reclamation.

Please let me know if you agree with Caerus' assessment and approach to administratively close the spill within the interim reclamation area which occurred in 2010.

Thank you,

**Blair Rollins**

Environmental Specialist

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**Form 19 - L26NW (Mamm) - Produced Water (45BBL) - 08.13.2010.pdf**  
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