



**Inspected Facilities**

Facility ID: 416247 Type: WELL API Number: 123-31314 Status: SI Insp. Status: EI

Facility ID: 485665 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

**Environmental**

**Spill/Remediation:**

**Comment:** ECMC Environmental Inspection Remediation Project 30816 for well plugging, cut & cap and Rule 911 assessment. Historical Release was reported 12/1/2023 for impacts discovered at the well. Spill ID 485665 was assigned and remains unresolved. Well site is backfilled.

Operator reported a historical release associated with the well flowline on 1/19/2024 via email and Initial Form 19 Document #403660699. The Form 19 indicated a Release at the flowline point at the well site, but was unclear whether the Release was the same as Release 485665. ECMC returned Form 19 Document #403660699 to Draft status on 1/23/2024 for clarifications regarding exact spill location and its relationship to Release 485665 and correction of lat/lon. Form 19 Document #403660699 has not been resubmitted.

ECMC received a Supplemental Form 27 Document #403660035 on 1/19/2024 that appeared intended to address the Spill at the flowline. ECMC returned Form 27 Document #403660035 to draft status on 1/23/2024 with a request to address several deficiencies enumerated on the Form: 1. No data package was attached, only a map. 2. Background samples were collected from areas previously disturbed by oil and gas activity; background samples for sites being decommissioned must be collected from areas not affected by previous oil and gas activity. This background data cannot be used to justify the presence of elevated soil suitability or metals concentrations, particularly as sample 14FL14@6.0', which may or may not be the same sample location as 11FL09@5.0'. These locations should be reported as a one or more potential historical Releases and investigated under Remediation Project #30856. 3. A previous Spill (485665) was reported at the wellhead on December 1, 2023, which may or may not be the same as the flowline Spill reported on Form 29 403660699. This Remediation Project should address both Spills and the Remediation Action Plan should be specific about what areas are to be addressed. 4. Sample location 14FL14@6.0' contained SAR > 6. As discussed, background samples are not valid. 14FRL14@6.0' must be reported/investigated as a historical Release at the tank battery and may or may not be the same as Sample 11FL12@6.0' included with the Sable USX AB11-11P. Investigate this Release/SAR impact as part of Remediation Project 30856 at the tank battery. 5. Site Investigation Plan contains conflicting statements and indicates and should be reviewed/revised by the Operator. Include planned site assessments on this section and be specific about what Releases/where the proposed site assessments will take place. 6. Reporting must be on a quarterly schedule, not one time upon receipt of analytical data. 7. Site Investigation was not complete on 1/8/2024 as impacts have not been defined to date. 8. Operator must continue to analyze samples for complete Table 915-1.

Form 27 Document #403660035 has not been resubmitted.

ECMC received a Supplemental Form 27 Document #403466390 on January 24, 2024 that proposed an excavation to address Release 485665 reported at the well. This Supplemental Form 27 included well assessment data only and did not include flowline data or address the flowline release.

<b>Corrective Action:</b>	<p>Resubmit the Initial Form 19 addressing the requested corrections for the flowline release. This release remains undocumented by the Form 19. Form is overdue.</p> <p>Submit a Supplemental Form 27 with a comprehensive plan that includes all flowline assessment results collected to date, analytical results for soil samples collected to date, and a comprehensive plan for site assessment and remediation of both the wellhead Release (ID 485665) and flowline Release (not yet assigned).</p>	<p><b>Date:</b> _____</p>
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Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
403737574	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6488809">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6488809</a>
693701145	ShableUSXAB11-14Pwellsite3-22-2024	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6488801">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6488801</a>