

FORM
22

Rev
01/20

State of Colorado
Energy & Carbon Management Commission

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



ECMC RECEPTION

Receive Date:
06/13/2024

Accident Tracking No.:
403819377

ACCIDENT REPORT

As required by Rule 602.f.

CONTACT INFORMATION

☒ Initial Notice of Accident ☐ Subsequent Notice of Accident

ECMC Operator Number: 10749

Contact Name: Christy Kost Christy Kost

Name of Operator: SIMCOE LLC

Phone: (970) 822-8931

Address: 1199 MAIN AVE SUITE 101

Fax: ()

City: DURANGO State: CO Zip: 81301

Email: christy.kost@ikavenergy.com

ACCIDENT DATE, TIME, and LOCATION (Please be as specific as possible)

Date of Accident: 01/15/2024

Time of Accident: 7:58 PM

API Number: 05- 067-06505

Facility ID:

Type of Facility: WELL

Well/Facility Name: SHOEMAKER

Well/Facility Num: 01-34 1

County: LA PLATA

Location: QTRQTR: NWSE

Sec: 34

Twp: 35N

Rng: 8W

Meridian: N

Lat: 37.255727

Long: -107.728732

Field Name: IGNACIO BLANCO

Field Number: 38300

Was there a reportable E & P waste spill or release associated with this accident?

Yes ☐

No ☒

If YES, enter the Document Number of the Initial Spill/Release Report, Form 19:

Was there a Grade 1 Gas Leak associated with this accident ?

Yes ☐

No ☒

If YES, enter the Document Number of the Initial Spill/Release Report, Form 44:

DESCRIPTION OF ACCIDENT

Number of members of the general public injured: 0

Number of workers injured: 0

Number of general public fatalities: 0

Number of worker fatalities: 0

Type of Accident (check all that apply):

☐ Fire

☐ Explosion

☐ Detonation

☐ Uncontrolled Release

☐ Vandalism

☐ Terrorism

☐ Hazardous Chemical

☒ Other Description: non-accident, human error

Firefighting Foam or Chemical Use

Were firefighting foams/chemicals utilized? No

If YES, please list the type, application percentage, and quantity of the firefighting foams/chemicals used:

Detailed Description of Accident:

- Do not include names of injured, injuries, or medical treatment information.
- Subsequent Report must include Root Cause.

Incident Trigger:

On January 15, 2024, a landowner reported an unusual noise at the Shoemaker 01-34 #1 well site, prompting the Upper Pine River Fire Department (FPD) to respond to the scene.

SIMCOE Response:

- SIMCOE was notified and promptly dispatched a team member, who arrived at the site within 35 minutes of the initial report.
- Upon arrival, the team member discovered a ½" natural gas valve with an attached 3/8" line open, causing gas to exit the 3/8" line at approximately 60 psig.

Root Cause of the Incident:

- The open valve was identified as improperly closed by a third-party contractor who had performed maintenance on the meter earlier that day.

- SIMCOE's team member immediately secured the valve, resolving the issue. The fire department did not perform any emergency services during this event.

Fire Department's Role:

- While on-site, the fire department took precautionary measures by advising two landowners at the staging area to return to their homes (shelter-in-place) until the area was secured. This was mainly to minimize the presence of additional personnel and vehicles around the release site.

Analysis of the Event

Regulatory Reference:

Reportable safety events are defined under Rule 602(g) to include incidents such as fires, explosions, uncontrolled releases, injuries, hazardous chemical spills, Grade 1 gas leaks, and any accidents causing property damage.

Incident Review:

- No fire, explosion, or uncontrolled release: The gas release was controlled immediately by securing the valve.
- No injuries: No injuries requiring medical treatment occurred.
- No hazardous chemical spill or Grade 1 gas leak: The release did not result in a reportable spill or hazardous condition. A Grade 1 gas leak is defined as a gas leak that ignites or poses a probable hazard requiring immediate repair or continuous action. This incident did not meet this definition.
- No property damage: There was no damage to property or structures.
- The gas release did not extend beyond 2,500 square feet, well below the 3,500 square feet threshold specified in the Emergency Response Guidebook. The nearest structure was also an abandoned trailer.

Additional Considerations

Response to Upper Pine River Fire Department (UPFD) Report:

The UPFD report indicates that a four-gas monitor detected a "flammable atmosphere" upon entering the location. However, a four-gas monitor typically alarms at 10% of the Lower Explosive Limit (LEL) for flammable gases, indicating only a percentage of methane rather than a fully flammable atmosphere. The instrument must read 100% LEL to confirm a flammable atmosphere. Therefore, the report's terminology may not accurately depict the event's severity. With natural gas being lighter than air and dissipating quickly, methane detected does not confirm a Grade 1 event.

Shelter-in-Place Clarification:

- Fire Chief Bruce Evans confirmed with SIMCOE's Safety & PSM Advisor, Ross Powell, on June 9, 2024, that the shelter-in-place advice given to landowners was precautionary and not an official order.
- SIMCOE has followed up with Fire Chief Evans twice to ensure the event did not threaten the landowners, the surrounding area, or the environment.

Purpose of Submission

SIMCOE is submitting this letter in response to a complaint filed by La Plata County's Local Government Designee asserting that we failed to report a safety event to the state or local government. As the fire department did not consider this an emergency, a fact verified twice by Fire Chief Bruce Evans, SIMCOE does not consider this a reportable event. The purpose of submitting this Form 22 is to defend our stance and halt any violations from the state.

Conclusion

The Shoemaker 01-34 #1 well event on January 15, 2024, does not constitute a reportable incident under the specified regulations. SIMCOE's prompt response and resolution, coupled with the lack of significant hazards or injuries specified by ECMC regulations and the fire department on site, support the conclusion that this incident falls outside the requirements for a reportable safety event. Given these details, we respectfully request this event be retracted based on the evidence and regulatory definitions provided. SIMCOE remains committed to adhering to all regulations and ensuring the safety and well-being of the community.

OTHER NOTIFICATIONS

List all parties and agencies that were notified or responded to the accident. (For example: Local Government Designee, Municipality, County, BLM, EPA, CDOT, Local Emergency Planning Coordinator, etc.)

Date	Agency	Contact	Response

OPERATOR COMMENTS and SUBMITTAL

The follow-up conversation SIMCOE had with Fire Chief Evans ensured SIMCOE that this event was not a reportable safety event. If this had been an actual emergency requiring the enactment of emergency protocols, SIMCOE would have adhered strictly to all regulations and promptly reported the incident.

This form must be signed by an authorized agent of the entity making assertion.

I certify under penalty of perjury that this report has been examined by me and to the best of my knowledge is true, correct and complete.

Print Name: Christy Kost

Email: christy.kost@ikavenergy.com

Signature: _____

Title: Regulatory Analyst

Date: 06/13/2024

CONDITIONS OF APPROVAL, IF ANY LIST

COA TypeDescription

0 COA	

ATTACHMENT LIST

Att Doc NumName

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Total Attach: 0 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

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