

STATE OF
COLORADO

Andrews - DNR, David <david.andrews@state.co.us>

COGCC Document No. 2056062

Re: WPX Inspection 11/20/2014 AIRS ID 123-1820 WELL HEAD LEAK

1 message

Andrews - DNR, David <david.andrews@state.co.us>

Wed, Dec 3, 2014 at 1:09 PM

To: "Kellerby - DNR, Shaun" <shaun.kellerby@state.co.us>, Robert Leteff - CDPHE <robert.leteff@state.co.us>, jodell.mizoue@wpxenergy.com, "Andrews, Michael" <Michael.Andrews@wpxenergy.com>

Cc: Craig Burger - DNR <craig.burger@state.co.us>, Jay Krabacher <jay.krabacher@state.co.us>

Correction: My 11/26 email indicated "2014, Not reported." One of the data fields in WPX's annual submittal was filtered, so I did not see this well in the 2014 report. After removing the filter, I confirmed that the following data was submitted:

- 9/9/2014, Initial Bradenhead Pressure 53 psi, Blew down in 3 minutes, fluid type n/a, final pressure 47 psi, no action required

Rob: You asked about a follow-up field inspection. I understand that Shaun Kellerby inspected the location last week, but the field inspection report has not been posted in our system yet.

Thanks,

Dave

On Wed, Nov 26, 2014 at 8:35 AM, Andrews - DNR, David <david.andrews@state.co.us> wrote:

All,

Installation of the vent pipe was approved via Form 4, Sundry Notice #2577468 (copy attached). It is true that venting approvals are routine in the Bradenhead Test Area for bradenhead valves. However, the approval for this well was to keep pressure relieved on the conductor - surface casing annulus, not the bradenhead annulus. Venting of that nature (conductor - surface casing annulus) is not governed by the Bradenhead Test Area Notice to Operators (copy attached) and associated Commission Orders. Instead, it is handled on a well-by-well basis.

Annual bradenhead pressure reports indicate the following:

- 10/25/2011, Initial Bradenhead Pressure 10 psi, Blew Down in 0.1 min, gas, final pressure zero, no action required
- 10/29/2012, Initial Bradenhead Pressure zero, gas, final pressure zero, no action required
- 9/11/2013, Initial Bradenhead Pressure 30 psi, Blew down in 3 minutes, fluid type n/a, final pressure 27 psi, no action required
- 2014, Not reported

With regard to the 9/11/2013 data, the final pressure of 27 psi appears to be the pressure at the end of the 7-day build prior to blowdown, rather than the pressure after blowdown.

To confirm the data shown above, COGCC staff will inspect the location to confirm that the conductor annulus, not the bradenhead annulus is venting through the riser. There is no approval in COGCC's well file for bradenhead venting on this well.

The original Sundry Notice request did not specify an expected duration for the venting. Typically, a specific duration or "indefinite" is requested for vent approvals. COGCC's COA referenced a "90-day venting period," but the COA that was used came from standard template language. For continued COGCC approval of this venting, a new Sundry Notice is required with a specified duration. The narrative History section presented in the original Sundry Notice should also be updated on the new Sundry Notice.

Thanks,

Dave

David D. Andrews, P.E., P.G.
Engineering Supervisor - Western Region



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On Tue, Nov 25, 2014 at 4:15 PM, Kellerby - DNR, Shaun <shaun.kellerby@state.co.us> wrote:
FYI

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

From: **Letteff - CDPHE, Robert** <robert.leteff@state.co.us>
Date: Mon, Nov 24, 2014 at 11:59 AM
Subject: Fwd: WPX Inspection 11/20/2014 AIRS ID 123-1820 WELL HEAD LEAK
To: shaun.kellerby@state.co.us

Hi Shaun,

This is Rob Letteff from the Air Pollution Control Division. I conducted some infrared camera inspections in Garfield County last week and I came across what I thought to be a leak at a well head at a WPX Energy tank battery.

JoDell Mizoue informed me that they allow venting from well heads in the bradenhead in that area to prevent pressure from building up. This is the first time we've come across something of this nature and I wanted to forward the information I received to get COGCC's feedback on it and to notify you of the findings as well. All of the information is in this email I'm forwarding.

Thanks in advance for your assistance with this, and please let me know if there's any additional information I can provide.

Thanks,

Rob Letteff

Robert Letteff
Environmental Protection Specialist / Infrared Camera Program
Oil & Gas Team



Office: [303-692-6381](tel:303-692-6381) | Cell: [720-737-6058](tel:720-737-6058) | Fax: [303-782-0278](tel:303-782-0278)
4300 Cherry Creek Drive South, Denver, CO 80246

robert.leteff@state.co.us | www.colorado.gov/cdphe/apcd

NOTE: *As of January 1, 2014, the Colorado Air Pollution Control Division no longer accepts blank or incomplete APENs. Additional fees may apply if an APEN is submitted without the necessary information. An application with missing information may result in longer processing times. Please note that all APEN submissions should be completed using forms currently supplied by the Division (See Reg. 3, Part A, Section II.A). Current APEN forms can be found at: <https://www.colorado.gov/cdphe/APENforms>*

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

From: **Mizoue, JoDell** <JoDell.Mizoue@wpxenergy.com>

Date: Fri, Nov 21, 2014 at 10:27 AM

Subject: RE: WPX Inspection 11/20/2014 AIRS ID 123-1820 WELL HEAD LEAK

To: "Letteff - CDPHE, Robert" <robert.leteff@state.co.us>

Cc: "Danforth, Brandon" <Brandon.Danforth@wpxenergy.com>

Hi Rob:

The "leak" on the open ended line you observed on the KP 523-18 wellhead is not a leak. This is the line that is venting gas to ensure that there is not excess pressure built up on the bradenhead. For this well, the valve was opened to ensure the pressure remains below 150 psi. COGCC requires that the pressures remain below 150 psi in the Kokopelli area and allows these lines to be opened to release the pressure. COGCC does not want the pressure in the surface casing to exceed 0.683 psi/ft to protect the integrity of the cement shoe. If the surface casing cement is compromised groundwater could contact the gas. Given the nature of bradenhead gas, it is not typically captured and controlled.

If you have any questions, please do not hesitate to contact me.

Thanks,

JoDell Mizoue



JoDell.Mizoue@wpxenergy.com

(303) 606-4056 (office)

(303) 524-0516 (cell)

From: Letteff - CDPHE, Robert [mailto:robert.leteff@state.co.us]

Sent: Thursday, November 20, 2014 11:33 AM

To: Mizoue, JoDell

Cc: Danforth, Brandon

Subject: WPX Inspection 11/20/2014 AIRS ID 123-1820 WELL HEAD LEAK

Dear Ms. Mizoue,

This is Rob Leteff with the Air Pollution Control Division ("Division") at the Colorado Department of Public Health and Environment. I am notifying you of the following observations made while conducting an Optical Gas Imaging Infrared Camera inspection of a condensate tank or tank battery owned/operated by WPX Energy in Garfield County. Here is the observation summary:

Company Name	Date	Time	AIRS ID	Site Name	Leak or Vent Location	Sensory Observation	Tank Storage Type	Tank Serial Number or Identifier	Separator Dumping?
WPX ENergy	11/20/2014	10:31 AM	123-1820	KP 34-18 Pad	Well Head (Leak came from open ended pipe at the well head)	Visual	N/A	Well Head KP 523-18	No

Leak produced visible waves that could be seen with the naked eye from up to 15 feet away, while facing northeast.

The Division requests WPX Energy to address the noted leak/issue and provide written information back that the leak/issue has been repaired/resolved, including date of repair, actions taken to repair the leak and the method used to verify repair of the leak/issue.

If the leak/issue is not repaired/resolved within 2 weeks of notification, please update the Division of the status of repair at that time, including the reason for delay of repair and the anticipated repair date. Once the repair has been completed and verified, the Division must be notified; otherwise, the leak may be considered a potential ongoing/unaddressed noncompliance issue.

Please reply back to me within 24 hours or by the next business day to confirm you have received this message and to provide an initial notice of the plan and timeline for addressing the leak/issue.

The Division is providing you with a copy of the attached IR Camera inspection video of your facility. The Division is providing this material to you pursuant to C.R.S. § 24-72-204(2)(a)(IX)(D), without waiving the investigatory privilege of C.R.S. § 24-72-204(2)(a)(IX) or any other applicable provision of C.R.S. § 24-72-204 for other records relating to your facility. Please let me know if there is any additional information I can provide.

Thank you for your time and assistance.

Sincerely,

Robert Leteff

Environmental Protection Specialist / Infrared Camera Program

Oil & Gas Team



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Air Pollution Control Division

Department of Public Health & Environment

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Robert Leteff

Environmental Protection Specialist / Infrared Camera Program

Oil & Gas Team



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Shaun Kellerby

North West Field Inspection Supervisor



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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2 attachments



2577468.pdf
171K



Garfield_Mesa_BHTA_NTO_2010-07-08.pdf
143K