



COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

September 14, 2015

Via Certified Mail 7104 0510 0002 0093 4543

BP America Production Company
Attn: Andrew Hawk
380 Airport Road
Durango, CO 81303

Re: Flowline CR 303
Spill Release Point ID: 443095
County Road 303
37.183749 / -107.818776
NW¼ NW¼, Section 22, Township 34 North, Range 9 West, LaPlata CO

Dear Mr. Hawk,

The Colorado Oil and Gas Conservation Commission (COGCC) is issuing a Notice of Alleged Violation (NOAV) (Document Number 200437191) to BP America Production Company (BP) (Operator Number 10000) for a release to Waters of the State.

On August 31, 2015, BP America Production Company (BP) (Operator #10000) reported a produced water spill (Initial Spill/Release Report Document # 400893645) due to a leak from the produced water flow line in NWNW Sec 22, T34N R9W, La Plata County, Colorado. This was reported to BP on August 31, 2015, by the surface landowner. BP responded to the location the same day and stopped the release. Initial assessment of the release area (Inspection # 674900752) determined that the produced water had traveled from the pipeline right of way (ROW) through a pasture, where it comingled with irrigation water leaking from a ditch to the southeast of the release point

Should you have any questions, please contact me at 303-894-2100 extension 5138.

Sincerely,

Alex Fischer, P.G.
Environmental Supervisor-Western Colorado

Cc: Matt Lepore, COGCC Director
Julie Murphy, COGCC Hearings Manager
Peter Gowen, COGCC Enforcement Supervisor
Greg Deranleau, COGCC Environmental Manager
Jim Hughes, COGCC SW Environmental Protection Specialist

Attachment 1 NOAV, Document Number 200437191
Attachment 2 Initial Spill/Release Report, Document Number 400893645
Attachment 3 Inspection Document Number 674900752

P 303.894.2100 F 303.894.2109 www.colorado.gov/cogcc

Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,
James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk

John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



<div>FORM NOAV Rev 6/99</div>	<div>State of Colorado Oil and Gas Conservation Commission 1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303) 894-2100 Fax: (303) 894-2109</div>	<div>STATE OF COLORADO OIL & GAS</div>	<div>FOR OGCC USE ONLY 09/14/2015 200437191</div>
<div>*** NOTICE OF ALLEGED VIOLATION ***</div>			
<div>OGCC Operator Number: 10000 Name of Operator: BP AMERICA PRODUCTION COMPANY Address: 501 WESTLAKE PARK BLVD ATTN: PATRICIA CAMPBELL City: HOUSTON State: TX Zip: 77079 Company Representative: ANDREW HAWK</div>			<div>Date Notice Issued: 09/14/2015</div>
<div>Well Name: Well Number: Facility Number: Location (QtrQtr, Sec, Twp, Rng, Meridian): NWNW 22 34N 9W M County: LA PLATA API Number: 05 Lease Number:</div>			
<div>COGCC Representative: Fischer Alex Phone Number: 303 894-2100 X5138</div>			
<div>THE FOLLOWING ALLEGED VIOLATION WAS FOUND BY THE COGCC REPRESENTATIVE FOR THE SITE LISTED</div> <div>Date of Alleged Violation: 08/31/2015 Approximate Time of Violation: Description of Alleged Violation: On August 31, 2015, BP America Production Company (BP) (Operator #10000) reported a produced water spill (Initial Spill/Release Report Document # 400893645) due to a leak from the produced water flow line in NWNW Sec 22, T34N R9W, La Plata County, Colorado. This was reported to BP on August 31, 2015, by the surface landowner. BP responded to the location the same day and stopped the release. Initial assessment of the release area (Inspection # 674900752) determined that the produced water had traveled from the pipeline right of way (ROW) through a pasture, where it comingled with irrigation water leaking from a ditch to the southeast of the release point.</div>			
<div>Act, Order, Regulation, Permit Conditions Cited: 324A.(a) & (b); 605.d; 1101.a.(1) & b. & e; 1102.a.(1)</div>			
<div>Abatement or Corrective Action Required to be Performed by Operator:* Submit a supplemental spill report to Document #400893645 by September 10, 2015. Submit a Form 27 - Site Investigation and Remediation Work Plan to the COGCC. Delineate extent of impacted area to determine remediation plan. Begin clean up of impacted areas to meet the standards in Table 910-1, to include soil investigation and remediation. Form 27 to be submitted by September 25, 2015. Develop a written plan that addresses how this problem will be avoided in the future, to include engineering, pressure testing of this segment of flowline, management, and training actions, as necessary. Submit to the COGCC by October 8, 2015.</div> <div>Abatement or Corrective Action to be Completed by (date): 10/08/2015 * Proper and timely abatement does not necessarily preclude the assessment of penalties and an Order Finding Violation.</div>			
<div>TO BE COMPLETED BY OPERATOR - When alleged violation is corrected, sign this notice and return to above address:</div> <div>Company Representative Name: Title: Signature: Date: Company Comments:</div>			
<div>*** THIS NOTICE CONSTITUTES A SEPARATE NOTICE OF ALLEGED VIOLATION FOR EACH VIOLATION LISTED ***</div>			
<div>PENALTY</div> <div>Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 523, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.</div>			
<div>ANSWER</div> <div>Pursuant to Rule 522.d.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgment may be entered. Hard-copy answers are filed with the Commission Secretary at the Commission's Denver office and should also be emailed to dnr_cogccenforcement@state.co.us.</div>			
<div>Signature of COGCC Representative: Date: Time: Resolution Approved by: Date:</div>			

State of Colorado

Oil and Gas Conservation Commission

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



Document Number:

400893645

Date Received:

09/01/2015

Spill report taken by:

Hughes, Jim

Spill/Release Point ID:

443095

SPILL/RELEASE REPORT (INITIAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Any spill or release which may impact waters of the State must be reported as soon as practicable; any spill over 20 bbls must be reported within 24 hours and all spills over five bbls must be reported within ten days. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

OPERATOR INFORMATON

Name of Operator:	BP AMERICA PRODUCTION COMPANY	Operator No:	10000	Phone Numbers		
Address:	380 AIRPORT RD					
City:	DURANGO	State:	CO		Zip:	81303
Contact Person:	Andrew Hawk					
				Phone:	(970) 375-7590	
				Mobile:	(970) 394-0253	
				Email:	andrew.hawk@bp.com	

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 400893645

Initial Report Date: 09/01/2015 Date of Discovery: 08/31/2015 Spill Type: Recent Spill

Spill/Release Point Location:

Location of Spill/Release: QTR QTR NWNW SEC 22 TWP 34N RNG 9W MERIDIAN M

Latitude: 37.183749 Longitude: -107.818776

Municipality (if within municipal boundaries): N/A County: LA PLATA

Reference Location:

Facility Type: FLOWLINE ☐ Facility/Location ID No

☒ No Existing Facility or Location ID No.

☐ Well API No. (Only if the reference facility is well) 05- -

Fluid(s) Spilled/Released (please answer Yes/No):

Was one (1) barrel or more spilled outside of berms or secondary containment? Yes

Secondary containment, including walls & floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

Were Five (5) barrels or more spilled? Yes

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl):	0	Estimated Condensate Spill Volume(bbl):	0
Estimated Flow Back Fluid Spill Volume(bbl):	0	Estimated Produced Water Spill Volume(bbl):	>=5 and <100
Estimated Other E&P Waste Spill Volume(bbl):	0	Estimated Drilling Fluid Spill Volume(bbl):	0

Specify: Initial calculations indicate approximately 92 barrels released

Land Use:

Current Land Use: CROP LAND Other(Specify):

Weather Condition: Partly cloudy, winds light, 86F

Surface Owner: FEE Other(Specify): Dorothy Eccher

Check if impacted or threatened by spill/Release (please answer Yes/No to all that apply):

Waters of the State ☒ Residence/Occupied Structure ☐ Livestock ☒ Public Byway ☒ Surface Water Supply Area ☐

As defined in COGCC 100-Series Rules

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

The leak occurred in a right of way adjacent to La Plata County Road 303. The water flowed from the ROW into an unirrigated pasture that contained two cattle at the time of the release. The produced water flowed from the point of release across the pasture into a shallow natural depression within the pasture that has the ability to convey water. The spill was stopped by shutting in the line that leaked and depressuring the pipeline. Samples of the produced water were taken at the time of discovery to characterize the release. Cattle in the pasture were removed by the landowner to remove any potential threat to the cattle. A plan for site soil sampling was discussed with Inspector Hughes during the site visit.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
8/31/2015	COGCC	Jim Hughes	970-903-4072	Site visit
8/31/2015	La Plata County OEM	Butch Knowlton	970-749-6344	Left a voicemail
8/31/2015	Landowner	Dorothy Eccher	-	Spoke with the landowner and gave release details

OPERATOR COMMENTS:

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: _____ Print Name: Andrew Hawk
Title: Environmental Advisor Date: 09/01/2015 Email: andrew.hawk@bp.com

COA Type Description

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Attachment Check List

Att Doc Num Name

400893645	FORM 19 SUBMITTED
400893708	SITE MAP

Total Attach: 2 Files

General Comments

User Group Comment Comment Date

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Total: 0 comment(s)

Inspector Name: Hughes, Jim

FORM
INSP

Rev
05/11

State of Colorado
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE

ET

OE

ES

Inspection Date:
08/31/2015

Document Number:
674900752

Overall Inspection:
ALLEGED VIOLATION

FIELD INSPECTION FORM

Location Identifier

Facility ID
443095

Loc ID

Inspector Name:
Hughes, Jim

On-Site Inspection
☐

2A Doc Num:

Operator Information:

OGCC Operator Number: 10000

Name of Operator: BP AMERICA PRODUCTION COMPANY

Address: 501 WESTLAKE PARK BLVD

City: HOUSTON State: TX Zip: 77079

☐ THIS IS A FOLLOW UP INSPECTION

☒ FOLLOW UP INSPECTION REQUIRED

☐ NO FOLLOW UP INSPECTION REQUIRED

☐ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Ellsworth, Stuart		stuart.ellsworth@state.co.us	
Beebe, Sabre	970-375-7530	Sabre.Beebe@bp.com	SW Insp Reports
Labowskie, Steve		steve.labowskie@state.co.us	
Weems, Mark		mark.weems@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
SW, BP		SanJuanCOGCC@bp.com	SW Insp Reports

Compliance Summary:

QtrQtr: Sec: Twp: Range:

Inspector Comment:

On August 31, 2015 COGCC SW EPS conducted an environmental field inspection of a produced water release from a BP flow line. This release was reported to COGCC verbally on 8/31/15 and spill report #400893645 was submitted on 9/1/15. This spill/release point ID is 443095. Andy Hawk, BP representative, collected fluid samples for analysis.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
443095	SPILL OR RELEASE	AC	09/01/2015		-	SPILL/RELEASE POINT	EI <input checked="" type="checkbox"/>

Equipment:

Location Inventory

Location

Emergency Contact Number (S/AV):

Corrective Date:

Comment:

Corrective Action:

Spills:

Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

Date Run: 9/5/2015 Doc [#674900752]

Page 1 of 5

Venting:				
Yes/No		Comment		
Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Predrill				
Location ID: 443095				
Site Preparation:				
Lease Road Adeq.:		Pads:	Soil Stockpile:	
S/A/V:				
Corrective Action:		Date:	CDP Num.:	
Form 2A COAs:				
S/A/V:		Comment:		
CA:		Date:		
Wildlife BMPs:				
S/A/V:		Comment:		
CA:		Date:		
Stormwater:				
Comment:				
Staking:				
On Site Inspection (305):				
Surface Owner Contact Information:				
Name:		Address:		
Phone Number:		Cell Phone:		
Operator Rep. Contact Information:				
Landman Name:		Phone Number:		
Date Onsite Request Received:		Date of Rule 306 Consultation:		
Request LGD Attendance:				
LGD Contact Information:				
Name:		Phone Number:	Agreed to Attend:	
Summary of Landowner Issues:				
Summary of Operator Response to Landowner Issues:				
Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:				
Facility				
Facility ID:	443095	Type:	SPILL OR	API Number: -
Status:	AC	Insp. Status:	EI	
Environmental				

Inspector Name: Hughes, Jim

Spills/Releases:

Type of Spill: WATER Description: Produced water Estimated Spill Volume: 92

Comment: Supplemental spill report shall be submitted by corrective action date listed. Per Rule 906.c., operator shall submit a Form 27 Site Investigation and Remediation Work Plan to SW EPS by September 21, 2015.

Corrective Action: Submit a supplemental spill report by CA date. Date: 09/10/2015

Reportable: YES GPS: Lat 37.183749 Long -107.818776

Proximity to Surface Water: 260 Depth to Ground Water: 70

Water Well:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1003a. Debris removed? _____ CM _____
CA _____ CA Date _____

Waste Material Onsite? _____ CM _____
CA _____ CA Date _____

Unused or unneeded equipment onsite? _____ CM _____
CA _____ CA Date _____

Pit, cellars, rat holes and other bores closed? _____ CM _____
CA _____ CA Date _____

Guy line anchors removed? _____ CM _____
CA _____ CA Date _____

Guy line anchors marked? _____ CM _____
CA _____ CA Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Inspector Name: Hughes, Jim

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

Comment: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____ Well Release on Active Location ☐ Multi-Well Location ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
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S/AV: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>On August 31, 2015 COGCC SW EPS Jim Hughes conducted an environmental field inspection of a produced water release from a BP flow line. This release was reported to COGCC verbally on 8/31/15 and spill report #400893645 was submitted on 9/1/15. This spill/release point ID is 443095. Andy Hawk, BP representative, was on site and collected fluid samples for analysis.</p> <p>Landowner reported release to BP Hotline on 8/31/15 at approximately 11:00 AM. The line was shut in and depressurized to stop the release. The flow line reportedly carries water from the Florida injection well to the Simon injection well. The cause of the release from the 6" flow line is under investigation. The One Call had been made in preparation of excavating the damaged flow line at the time of this inspection.</p> <p>Release flowed into a pasture to the south where it flowed south-south west through a natural depression. A ditch to the south east of the release point was noted as having a leak which flowed into the same pasture. This water flows into the same natural depression. A sample of the produced water was taken at the release point by BP personnel. A sample of the irrigation waste water was collected near a culvert at the south end of the pasture. Both samples were taken to Green Analytical Laboratory in Durango, CO.</p>	hughesj	09/04/2015

Attached Documents

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

Document Num	Description	URL
674900753	Release point adjacent to C.R. 303	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3677310
674900754	View from release point toward direction of flow.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3677311
674900755	Irrigation ditch southeast of release point.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3677312
674900756	View southwest towards direction of travel.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3677313