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December 22, 2016

VIA HAND DELIVERY AND EMAIL

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Secretary of the Commission
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 802
Denver, CO 80203

Re: Doc. No. 401133244,
NOAV Nov. 23, 2016

Ladies and Gentlemen:

We have been retained by Chevron USA Inc. ("Chevron") regarding the above referenced Doc. No. 401133244, NOAV, issued by the Colorado Oil & Gas Conservation Commission ("Commission") on November 23, 2016, and received by Chevron on November 29, 2016 (the "NOAV"). Chevron's Answer is due December 27, 2016. Chevron is filing its Answer prior to the due date in order to respond to corrective actions demanded by the Commission by December 23, 2016. Pursuant to 2 CCR 404-1:522.d.(2), we respectfully submit the below Answer to the NOAV on behalf of Chevron.

Chevron first expresses its appreciation for the cooperation and assistance provided by the Commission on the range of issues which Chevron and the Commission have cooperatively and collaboratively addressed over almost 80 years in Colorado. Chevron started working in the Rangely Weber Sand Field in 1944, and it began serving as operator of that field in 1957. Chevron produces about 16,000 barrels of oil and natural gas liquids per day, from about 800 wells. Chevron's Wilson Creek Field yields approximately another 486 barrels of oil per day. Chevron's San Juan Basin operations and Piceance Basin operations yield about 75 million cubic feet of natural gas per day,

from approximately 252 wells. Chevron takes great pride in achieving full compliance at all of its operational sites. Chevron also values its strong working relationship with the Commission.

I. OPERATOR RESPONSE TO NOAV 401133244

An NOAV is a “Notice of Alleged Violation” as described in Commission Rule 522. It is issued if the Director has “reasonable cause to believe” the operator has violated a Commission Rule, Order, permit, or the Oil and Gas Conservation Act, § 34-60-101 *et. seq.*, C.R.S. (“Act”). 2 CCR 404-1:522.a. Reasonable cause requires, at least, physical evidence of the alleged violation, as verified by the Director. *Id.*

The Commission and the Director must take into account whether any alleged violation resulted in significant adverse environmental impacts which could have been avoided through cost-effective and technically feasible operations and infrastructure. The general assembly delegated limited authority to the Commission. The Commission can only regulate to: “[P]revent and mitigate significant adverse environmental impacts on any air, water, soil, or biological resource resulting from oil and gas operations to the extent necessary to protect public health, safety, and welfare, including protection of the environment and wildlife resources, taking into consideration cost-effectiveness and technical feasibility.” C.R.S. § 34-60-106(2)(d) (2016).

The Director typically will not issue an NOAV if *force majeure* appears to be the sole cause of an alleged violation. COLORADO OIL AND GAS CONSERVATION COMMISSION ENFORCEMENT GUIDANCE AND PENALTY POLICY, Apr. 2015, at 23 (hereinafter “P&V Policy”). Where the Director determines *force majeure* does not constitute a complete defense but was a substantial contributing factor to the violation or adverse impacts arising from the violation, the concept may nonetheless be applied as a mitigating factor. *Id.*

Both the Colorado and United States Constitutions also require that any fine issued must be proportional to the harm caused. *May v. Colorado Civil Rights Comm'n*, 43 P.3d 750, 758 (Colo. App. 2002). While no strict criterion exists for determining an excessive fine, generally the fine must be “reasonably related to the severity of the offense.” *People v. Malone*, 923 P.2d 163, 165 (Colo. App. 1995).

Here the NOAV asserts multiple stacked violations which are not supported by the alleged threatened or actual harm. If fines are assessed, the Commission must avoid compounding fines which would be disproportionately punitive and arbitrary in nature—particularly given the *force majeure* event which caused the release.

Chevron respectfully submits the facts demonstrate there were no violations of the Act, or Commission rules or orders. Chevron therefore respectfully requests the Director to rescind and dismiss with prejudice the subject NOAV.

II. BACKGROUND

A sudden and significant rain and lightning event commenced on August 7, 2016, impacting operations in the Rangely Weber Sand Unit in Rio Blanco County, Colorado. There were multiple and recurring thunderstorms which continued intermittently into the early morning hours of August 8, 2016. This storm event caused significant erosion of an intermittent stream bed, exposing the Fee 73x fiberglass flow line (“Fee 73x Flowline”). The erosion also caused the stream banks to collapse onto the Fee 73x Flowline, breaking it and resulting in the incident described below.

A. The Location

The Fee 73x Flowline is a buried flowline which was installed in late 1986/early 1987. It was installed with approximately 6’ of cover. The Fee 73X Flowline transects an intermittent stream located on non-crop land and has been utilized without incident for close to 30 years.

The Fee 73x Flowline transports produced water and hydrocarbons from the Fee 73x Well to a production header. The production header is a pipe arrangement that connects flowlines from several wellheads into a single gathering line. There is also a low pressure detector in the Fee 73x Flowline which shuts the well off in the event low pressure is detected in the Fee 73x Flowline. A check valve is installed in the Fee 73x Flowline near the production header which prevents backflow of fluids from the production header towards the 73x Well.

Chevron has an Asset Integrity Program in place which employs Spill Prevention Control and Countermeasures (“SPCC”) including, among other things, the use of 29 “siphon” impoundments designed to capture and contain spills and releases. Chevron’s SPCC system is designed so that when the fluid level reaches a certain height, a pipe allows fluid to flow through the pipe and continue downstream. The flow-through pipe has alarms which notify Chevron when the siphon is full.

The incident occurred on remote non-crop land approximately 100’ upstream from “Siphon 43”, on the upstream side of the production header check valve. There are no water wells or permanent surface waters within a quarter-mile of Siphon 43. Local groundwater depth is greater than 5,000’ below ground surface. The location is not within a Rule 901.e. sensitive area.

B. The Incident and Response

As noted above, a sudden and significant rain and lightning event commenced on August 7, 2016 which was comprised of multiple and recurring thunderstorms. These storms continued intermittently into the early morning hours of August 8, 2016. The annual average rainfall is 11.15 inches over the last 30 years. Rainfall recorded on August 8, 2016 in conjunction with the incident, was 0.97 inches—more than one month's average rainfall in less than a day.¹ This was a significant rain event for the Rangely, Colorado region which resulted in damage and disruptions that had not been experienced in over eighty years of continuous operations.

The high siphon level alarms for all 29 siphons, including the Siphon 43 alarm, sounded on August 8, 2016. There were also multiple lightning strikes which caused power outages in various field locations. Because of the rain event, when the siphon alarm sounded Chevron personnel reasonably believed the alarm was attributable to the deluge of rain the area had just received. Chevron called in additional staff to begin inspecting the numerous siphon sites where alarms had been activated and to address the power outages. Chevron inspected each of the siphons over the next few days and it reached Siphon 43 on the morning of August 10, 2016. There was no release from any siphon other than Siphon 43.

While inspecting Siphon 43, Chevron discovered that systems had shut off the Fee 73x Well due to low flowline pressure. Chevron personnel then walked the Fee 73x Flowline and found it broken approximately 100' upstream from Siphon 43. Investigation established that soil over the Fee 73x Flowline had been washed away, exposing several feet of the Fee 73x Flowline. The erosion also caused the stream banks to collapse onto the Fee 73x Flowline, which was broken in three places—at each side of the newly created wash banks, and approximately in the middle of the exposed section of the Fee 73x Flowline.

Chevron observed a hydrocarbon release and immediately inspected the check valve between the break in the Fee 73x Flowline and the production header. A broken hinge on the valve had prevented it from completely sealing. The check valve otherwise worked as designed, and in combination with Chevron's siphon system and the flowline low pressure detector which shut off the Fee 73x Well, a potential significant release was prevented.

Virtually all of the observable hydrocarbons were successfully contained in Siphon 43. The vast majority of the spill path was free of hydrocarbons, although a limited amount of hydrocarbon residue was observed sporadically in vegetation and on

¹ <http://www.usclimatedata.com/climate/rangely/colorado/united-states/usco0327>

soil at the high-water mark along the spill path. There were no observable impacts to wildlife.

Chevron was on-site to begin remediation within 30 minutes of discovering the release. Approximately 29.25 BBLS of oil, and 229.1 BBLS of produced water mixed with an estimated 3,029 BBLS of rainwater Liquids were vacuumed up and trucked to the main Rangely oil and water separation plant for disposal. Contaminated vegetation and soil were also removed. Soil was taken to the Rangely land farm for bioremediation. Vegetation was hauled and disposed of as soil waste per local regulation. The affected area was also washed down with potable water. The check valve was replaced. The Fee 73x Flowline was repaired and pressure tested. Chevron also encapsulated the repaired section of the Fee 73x Flowline in order to prevent any similar future event.

C. Chevron Reporting and Commission Action

Pursuant to 2 CCR 404-1:906.b., Chevron immediately verbally reported the release that same day to Alex Fischer, West Environmental Supervisor for the Commission, and Kris Neidel, Northwest Environmental Protection Specialist for the Commission. Kris Neidel visited the site with Chevron personnel the next morning on August 11, 2016. Chevron filed its Form 19 – Spill/Release Report (“Form 19”) within 72 hours of the incident. (Doc No. 401092833, Form 19, Aug. 12, 2016). The status of Chevron’s clean-up and reclamation, including additional task items, were discussed with Mr. Neidel and orally approved at that time.

Chevron identified and reported the spill terminus by testing soil samples for chlorides. Supplemental information concerning soil sampling and testing is reported in the Commission’s August 23, 2016 Field Inspection Form. (Doc. No. 685100057).

The Commission issued a Corrective Action Required Inspection Report on August 23, 2016. (Doc. No. 685100057). Based on that report, the alleged violations cannot be greater than Class 1 or Class 2 violations where the degree of actual or threatened impact was at worst Minor or Moderate. (P&V Policy, at 3). The box noting the Commission’s determinations based on its inspection notes: “Overall Inspection: SATISFACTORY w/ CMT or AR,” *i.e.*, the inspection was satisfactory—see comments, and action required. No need for an NOAV was indicated. The only action required/identified corrective action was the filing of paperwork: a Form 27 Site Investigation and Remediation Workplan, which was requested by November 1, 2016.

The absence of any indication for consideration of an NOAV continued when Mr. Neidel conducted a follow up inspection on September 28, 2016. (Doc. No. 685100065). “No remaining hydrocarbon impact was detected during the inspection.” While this inspection form notes Chevron should file a Form 27 pursuant to Doc. No. 401099835,

the September inspection report left the box unchecked for “Corrective Action Response Requested”, and denoted a “0” for Number of Corrective Actions. The referenced Doc. No. 401099835 contained no deadlines.

Chevron filed a Form 27 on November 28, 2016 upon receipt of soil sample analyses from impacted areas to ensure compliance with Table 910-1 requirements. All other information pertinent to the Form 27 was already on file with the Commission as reflected in the Form 19 and the Inspection Report.

III. SPILL/RELEASE EVALUATION

Chevron determined that the Fee 73x Flowline unexpectedly failed when a sudden and unpredictably extreme *force majeure* rain event eroded between 3’ to 6’ of cover overlying the flowline and the supporting soil under the flowline. The Fee 73x Flowline is comprised of a fiberglass material sufficient to prevent internal pipe corrosion and external pipe erosion. A macroscopic visual inspection of the flowline breaks demonstrated that an extreme, localized and sudden external force snapped the pipe. That information coupled with an inspection of the wash banks disclosed the rushing water undermined the newly heightened channel bank (caused by the rushing water deepening the wash) which then collapsed upon the unsupported and exposed flowline and caused the flowline to snap. Chevron has no record of a similar event occurring during the 84-year history of operating the Rangely Weber Sand Unit.

Chevron also determined that the check valve had partially failed which prevented the check valve from completely isolating the broken section of Fee 73x Flowline from the production header. A very limited amount of hydrocarbons and produced water was able to flow back towards the well and therefore towards the broken Fee 73x Flowline.

The *force majeure* thunderstorms and system wide siphon alarms led Chevron to reasonably believe there were no active spill or release events specific to Fee 73x Flowline and Siphon 43. Chevron did not immediately discover this particular release because it was systematically inspecting all of the siphons and addressing other field issues such as power outages.

IV. DOC. NO. 401133244, NOAV, NOV. 23, 2016

Chevron submits the facts demonstrate that the incident resulted from a *force majeure* event, and there were no violations of the Act, or Commission rules or orders. Chevron therefore respectfully requests the Director rescind and dismiss with prejudice the subject NOAV for the reasons described below for each alleged violation.

Alternatively, Chevron requests the Director impose no fines for any of the violations, except perhaps Chevron's inadvertent failure to file a Form 27 by November 1, 2016. In general, a Warning Letter or Corrective Action Required Inspection Report, in lieu of an NOAV and fines, is appropriate for an alleged violation of a Class 1 or Class 2 Rule that has a Moderate or Minor impact if the Director determines all of the following factors exist:

1. The violation did not and will not result in actual or a threat of significant adverse impacts to public health, safety, or welfare, including the environment and wildlife resources, significant waste of resources, or significant harm to correlative rights;
2. Corrective action can bring the operator into compliance quickly;
3. The operator has a good compliance history;
4. The violation is not part of a pattern of violation by the operator; and
5. The operator has not received a recent Warning Letter or Corrective Action Required Inspection Report for a similar violation under similar circumstances.

A Warning Letter or Corrective Action Required Inspection Report will describe the corrective action required and the deadline by which the operator must complete the corrective action and provide the Director with notice, including evidence of completion. (P&V Policy, at 5).

The Commission issued a Corrective Action Required Inspection Report on August 23, 2016. (Doc. No. 685100057). Accordingly, the alleged violations are either Class 1 or Class 2 violations where the degree of actual or threatened impact is at worst Minor or Moderate. (P&V Policy, at 3). The only requirement was to file paperwork: a Form 27 by November 1, 2016. None of the alleged violations in the NOAV were the subjects of a previous Warning Letter or Corrective Action Required Inspection Report. Chevron has an excellent compliance history; Chevron has complied with the NOAV requirements as demonstrated by its Answer to the NOAV; the alleged violations are not part of a pattern of violations; and Chevron has not received a recent Warning Letter or Corrective Action Required Inspection Report for a similar violation under similar circumstances. Indeed, there could be no similar circumstances, since the incident resulted from a *force majeure* event which caused damage that had no precedent in over 80 years of continuous operations. Chevron therefore respectfully requests the Director waive all fines in the event he finds that recission is inappropriate.

A. Alleged Violation of Rule 605.d.

1. *Response to Alleged Violation*

2 CCR 404-1:605.d. Mechanical Conditions, states that “[a]ll valves, pipes and fittings shall be securely fastened, inspected at regular intervals, and maintained in good mechanical condition.”

The Director asserts that Chevron failed to ensure that the pipeline was in good mechanical condition, violating Rule 605.d, but provides no basis for that assertion. The mere fact the flowline failed is not proof the flowline failure should have been reasonably anticipated, or that the flowline failed while being subjected to stresses within the design limits of the flowline.

Chevron’s Asset Integrity Program, as further discussed in its approved variance to Rule 1102.e.(1) (discussed in more detail below), demonstrates it took adequate measures to ensure the Fee 73x Flowline was maintained in good mechanical condition. It took an extreme “Act of God” for this flowline to fail. Chevron therefore respectfully submits that the alleged violation of Rule 605.d. is arbitrary and capricious, based upon findings of fact that are clearly erroneous on the whole record, unsupported by substantial evidence, and otherwise contrary to the Commission policy. Chevron respectfully requests the Director to rescind the NOAV as to this alleged violation.

2. *Corrective Action*

a. Operator shall immediately submit a Form 27

Chevron previously submitted its Form 27 on November 28, 2016. (Doc. No. 401156795). Form 27 was submitted on the same day Chevron received the analysis of soil samples along impacted areas to ensure compliance with Table 910-1 requirements. Chevron will submit on January 2, 2017 its Supplemental Form 27 progress report in compliance with all conditions of approval attached by the Commission to the November 28, 2016 Form 27.

b. Operator shall continue cleanup to satisfy Table 910 – 1

Chevron has submitted data demonstrating all Table 910–1 hydrocarbon requirements have been met. (Appendix “A”, Table 910-1 Data Package). Chevron proposes that cleanup operations be suspended through the winter because the only exceedance is a single electro-conductivity (“EC”) variance, and the ground is now intermittently snow-covered, and frozen. Chevron believes it is reasonable to retest as soon as the ground is no longer frozen, and then take any necessary action by either water

washing the localized area if it is not already in compliance, or submitting results to show that the location meets the requirements of Table 910-1.

c. Supplemental Form 27 progress reports

The Commission is requiring Chevron to submit a Form 27 monthly progress report until the initial incident report can be closed. Chevron instead requests that the release be closed because all organics are in compliance with Table 910-1, and all other standards are met except for the one EC test. The EC exceedance is only slightly above Table 910-1 limits in an area historically devoid of vegetation. Additionally, Chevron will need to wait until after the spring runoff to remediate chloride (if necessary), due to current weather conditions in the area.

d. Written plan to avoid similar incidents

See discussion under Rule 1101 below.

B. Alleged Violation of Rule 907.a.

1. *Response to Alleged Violation*

2 CCR 404-1:907.a. Management of E&P Waste, states in pertinent part that operators shall transport E&P waste to prevent “threatened or actual significant adverse” impacts. The Director asserts that Chevron failed to manage E&P Waste in a manner protective of waters of the state, causing or threatening to cause significant adverse impacts, violating Rule 907.a. This asserted violation is derivative and dependent upon the alleged violations of Rules 605, 1101, and 1102, and no factual basis is provided to support the assertion. Once again, the mere fact the flowline failed is not proof the flowline failure should have been reasonably anticipated, or that the flowline failed while being subjected to stresses within the design limits of the flowline.

Moreover, the Commission issued a Corrective Action Required Inspection Report on August 23, 2016. (Doc. No. 685100057). Accordingly, the alleged violations are either Class 1 or Class 2 violations where the degree of actual or threatened impact is at worst Minor or Moderate. (P&V Policy, at 3). The Minor or Moderate designations preclude any finding there was a violation of Rule 907.a. which regulates “significant” adverse impacts.

Chevron’s Asset Integrity Program, as further discussed in its approved variance to Rule 1102.e.(1) (discussed in more detail below), further demonstrates it took adequate measures to ensure the Fee 73x Flowline was maintained in a manner protective of waters of the state and designed to prevent significant adverse environmental impacts from E&P

waste in a technically feasible and cost-effective manner. It took an extreme “Act of God” for this flowline to be damaged in such a way to cause a release

Chevron installed multiple siphons along the wash in a voluntary, proactive manner to protect the navigable waterways in and near the field. Siphon 30 is the key siphon Chevron maintains to ensure that navigable waterways are neither impacted nor threatened. Siphon 30 was neither breached nor contaminated.

As demonstrated above, Chevron also immediately removed the contaminated soil and fluids in accordance with state regulations. Furthermore the data shows that Chevron went above and beyond regulatory requirements and remediated to a level less than 25% of the Table 910-1 thresholds.

Chevron therefore respectfully submits that the alleged violation of Rule 907.a. is arbitrary and capricious, based upon findings of fact that are clearly erroneous and contrary to the record, unsupported by substantial evidence, and otherwise contrary to the Commission policy. Chevron respectfully requests the Director to rescind the NOAV as to this alleged violation.

2. *Corrective Actions*

- a. Operator shall immediately submit Form 27

See discussion above regarding Rule 605.

- b. Operator shall continue cleanup of impacted areas to meet the state the standards in Table 910–1

See discussion above regarding Rule 605.

- c. Operator shall submit Supplemental Form 27 progress reports on a monthly basis do the first business day of each month.

See discussion above regarding Rule 605.

- d. Operator shall 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.

See discussion under Rule 1101 below.

C. Alleged Violation of Rule 1101

1. *Response to Alleged Violation*

Chevron first submits it cannot be held to have violated the installation provisions of the 1100 Series of the rules which were promulgated almost 10 years after the flowline was installed. The Fee 73x Flowline was installed in late 1986/early 1987. The 1100 Series of the rules were not promulgated until 1996. (Order No. 1R-69, Mar. 29, 1996).

Regardless, Table 841.1.11-1 of ASME 31.8-2016 demonstrates Chevron buried its flowline deeper than the recommended 36". (Appendix "B", excerpt). The fiberglass material used is also sufficient to prevent internal corrosion and external erosion of the piping material. The flowline failure was not a result of poor engineering or installation, but rather an "Act of God" rainfall event that could not be reasonably predicted. Chevron respectfully requests the Director to rescind the NOAV as to this alleged violation.

2. *Corrective Actions:*

- a. Operator shall submit the information required under its COGCC approved Variance Request (Doc. No. 400932728) to document flowline integrity and explain why the continuous pressure monitoring augmented with a set of best practices did not prevent the leak or minimize the spill volumes.

Chevron's monitoring and maintenance program did not prevent the flowline failure because the *force majeure* events of August 7-8, 2016 imposed unanticipated stresses to the system not seen in over 80 years of operations, and which significantly exceeded reasonably anticipated operating parameters which form the basis for Chevron's monitoring and maintenance program. The requested information is attached as Appendix "C" (GIS Shape files); Appendix "D" (Change Report demonstrating Chevron's ongoing flowline replacement program); and Appendix "E" (Spills/Releases in 2016 demonstrating the effectiveness of Chevron's program).

- b. Operator shall 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.

Chevron already complies with the required engineering standards. Pursuant to its approved variance, Chevron also Hydro tests all lines every 5 years.

Chevron is proactively managing its system, replacing the highest risk flowlines before those lines might fail. Specifically the operator is attaching all work requests completed in the last 3 years on the Fee 73x Flowline which demonstrates this flowline has been actively monitored and maintained. (See Appendix “F” Fee 73x Flowline Work Orders).

Chevron constantly updates its personnel training in response to new technology, events, or to modify Chevron’s existing monitoring and maintenance program in response to operational events. As a result of the incident investigation, Chevron has already implemented the requirement to walk down every flowline following a low-pressure shutdown from a well. Additionally, a high level Siphon alarm will require a visual inspection of that Siphon for each day it is in high-level alarm status, if the Siphon cannot be pumped down that day.

D. Alleged Violation of Rule 1102

1. *Response to Alleged Violation*

2 CCR 404-1:1102.a. Management of E&P Waste, requires operators to take “reasonable precautions to prevent failures, leakage and corrosion of pipelines.” The Director alleges Chevron failed to take reasonable precautions to prevent failures, leakage and corrosion of pipelines resulting in the release.

Chevron again submits it cannot be determined to have violated the installation provisions of the 1100 Series of the rules which were promulgated almost 10 years after the flowline was installed. Chevron nonetheless had a Commission approved, cost-effective, and technically feasible process in place which was being actively utilized to prevent these types of events. The flowline failure was not attributable to any breakdown or deficiency in that process. It was instead attributable to an “Act of God” rainfall event that could not be reasonably predicted. Chevron respectfully requests the Director to rescind the NOAV as to this alleged violation.

2. *Corrective Action*

- a. Operator shall submit the past three (3) years’ worth of maintenance records for this segment of pipeline and records for repair completed.

See Appendix “F” Fee 73x Flowline Work Orders. See also Appendix “G” (Pre- and Post-Spill Pressure Test charts).

- b. Operator shall 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.

See discussion above under Rule 1101.

V. CONCLUSION

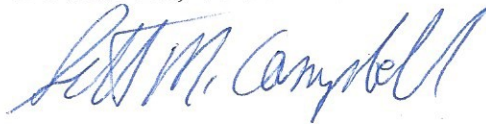
Chevron respectfully submits the failure of the Fee 73x Flowline and resulting release incident were caused solely by the *force majeure* rain events of August 7-8, 2016. Chevron's installation of the flowline and its monitoring and maintenance program comply with the Colorado Oil and Gas Conservation Act, and its implementing rules, orders and policies. Chevron's monitoring and maintenance program also demonstrated the Fee 73x Flowline was in good working order under normal and reasonably anticipated operating scenarios.

Chevron's SPCC system and continuous monitoring system also prevented any threatened or actual significant adverse impacts to the environment, wildlife, or the public health, safety and welfare, which is reflected in the Commission's own inspection reports. Chevron's on-site response and self-reporting to the Commission were also immediate. Chevron actively cooperated with Commission staff to immediately implement appropriate remediation, reclamation, and repair operations, all of which were timely completed to higher standards than required.

Finally, the historical data shows that Chevron's performance exceeds industry performance within the State, and shows continual improvement on a legacy asset. Chevron therefore respectfully requests the Director to rescind the NOAV with prejudice.

Very truly yours,

POULSON, ODELL & PETERSON, LLC



Scott M. Campbell

/smc

Encs.

Cc: Chevron USA Inc.
Steven Mah <steven.mah@state.co.us>