

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

401261384

Date Received:

04/18/2017

Spill report taken by:

LUJAN, CARLOS

Spill/Release Point ID:

449635

SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 906.b. for reporting requirements of spills or releases of E&P Waste or produced fluids. Submit a Site Investigation and Remediation Workplan (Form 27) when requested by the Director.

OPERATOR INFORMATION

Name of Operator: <u>VANGUARD OPERATING LLC</u>	Operator No: <u>10531</u>	Phone Numbers
Address: <u>5847 SAN FELIPE #3000</u>		Phone: <u>(970) 876-1959</u>
City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77057</u>		Mobile: <u>()</u>
Contact Person: <u>Scott Ghan</u>		Email: <u>sghan@vnrllc.com</u>

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 401230823

Initial Report Date: 03/10/2017 Date of Discovery: 03/09/2017 Spill Type: Recent Spill

Spill/Release Point Location:

Location of Spill/Release: QTRQTR NENE SEC 36 TWP 6S RNG 92W MERIDIAN 6

Latitude: 39.488790 Longitude: -107.610570

Municipality (if within municipal boundaries): _____ County: GARFIELD

Reference Location:

Facility Type: TANK BATTERY Facility/Location ID No 159159
 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): Unknown

Estimated Other E&P Waste Spill Volume(bbl): 0 Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: _____

Land Use:

Current Land Use: NON-CROP LAND Other(Specify): _____

Weather Condition: Sunny 55 degrees

Surface Owner: FEE Other(Specify): Clark Scott

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 release occurred at a weld , near a loadout valve, on a produced water tank located inside a lined secondary containment. There was stormwater present both inside and outside the secondary containment at the time of the release. It is suspected that the synthetic liner along the perimeter of the containment may be compromised in two isolated locations, but this was difficult to determine due to the presence of stormwater outside the containment. The suspected spill path will be sampled to verify. The release was not observed by the SWD operator during his 0600 tank inspections, but was later identified by our lease operator at 1130. Based on these observations, it appears the release was short in duration at a minimal flowrate. The tank was isolated and emptied and all the water was removed from inside the secondary containment via vacuum truck. All pooling water along the suspected spill path was also recovered during the response activities.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
3/9/2017	COGCC	Carlos Lujan	-	approved of response activities
3/9/2017	GarCo	Kirby Wynn	-	notified via email
3/9/2017	landowner	Clark Scott	970-618-3828	approved of response activities

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 04/18/2017

Cause of Spill (Check all that apply) Human Error Equipment Failure Historical-Unknown
 Other (specify) _____

Describe Incident & Root Cause (include specific equipment and point of failure)

As previously noted, the release occurred at a weld, near a loadout valve, on a produced water tank located inside a lined secondary containment. The release was determined to be short in duration and the flowrate was minimal. Operational procedures, such as daily tank inspections and the spill response activities minimized the released volume. Stormwater was present both inside and outside the lined secondary containment at the time of the release. As part of the investigation, the integrity of the secondary containment liner was inspected by removing the ballast gravel from the containment. Multiple small punctures were identified during the liner integrity inspection. This is the first documented release to have occurred within this secondary containment based on the review of both Vanguard and COGCC records. The secondary containment does hold stormwater on a seasonal basis for short periods of time, but the analytical results from recent soil sampling within the stormwater flow path indicate that the low volume produced water release and the compromised containment liner did not impact soils on the location. Please see the attached report from a third-party consultant which details the sampling and analytical results.

Describe measures taken to prevent the problem(s) from reoccurring:

The tank was removed from the secondary containment and the loadout valve assembly was disconnected from the tank. This port on the tank will no longer be utilized and will remain plugged. The tank will be cleaned and the epoxy coating inside the tank will be inspected. If deemed necessary, additional epoxy coating will be applied to the inside of the tank. The sacrificial anode inside the tank will also be inspected and replaced, if necessary, before the tank is put back into service. The secondary containment system will be replaced utilizing an improved tank ballast and liner system. Vanguard will update the COGCC, via an additional supplemental report, upon completion of the secondary containment activities and request "closure " of this incident at that time.

Volume of Soil Excavated (cubic yards): _____

Disposition of Excavated Soil (attach documentation) Offsite Disposal Onsite Treatment
 Other (specify) _____

Volume of Impacted Ground Water Removed (bbls): _____

Volume of Impacted Surface Water Removed (bbls): _____

REQUEST FOR CLOSURE

Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.

Basis for Closure: Corrective Actions Completed (documentation attached)

Work proceeding under an approved Form 27

Form 27 Remediation Project No: _____

OPERATOR COMMENTS:

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

Signed: _____ Print Name: Scott Ghan

Title: Senior EHS Specialist Date: 04/18/2017 Email: sghan@vnrlc.com

COA Type**Description**

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Attachment Check List**Att Doc Num****Name**

401261384	SPILL/RELEASE REPORT(SUPPLEMENTAL)
401262050	OTHER
401262935	FORM 19 SUBMITTED

Total Attach: 3 Files

General Comments**User Group****Comment****Comment Date**

Environmental	COGCC concurs with Vanguard statement in the Corrective Action tab (this e-form): "Vanguard will update the COGCC, via an additional supplemental report, upon completion of the secondary containment activities and request "closure " of this incident at that time. "	04/19/2017
Environmental	COGCC concurs with LTE statements on their sampling report: "Vanguard is inhibiting any vegetation growth on the production location and the SAR values are not threatening vegetative growth. All SAR exceedances will be addressed during the final reclamation processes of the production location."	04/19/2017

Total: 2 comment(s)