

STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Fwd: COGCC NOAV No. 401297902 - questions

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: OGCC EnviroScan - DNR <dnr_ogcc.enviroscan@state.co.us>
Cc: Kris Neidel - DNR <kris.neidel@state.co.us>

Mon, Jun 19, 2017 at 9:41 AM

Please upload this email to:

Spill Release IDs: 449608 and 451001
NOAV: 41297902
REM: 10096.

Thanks
Alex

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

From: **Ferrin - DNR, Jeremy** <jeremy.ferrin@state.co.us>
Date: Mon, Jun 19, 2017 at 9:29 AM
Subject: Re: COGCC NOAV No. 401297902 - questions
To: Dave Weinert <davew@kirkwoodcompanies.com>
Cc: "Neidel - DNR, Kris" <kris.neidel@state.co.us>, "alex.fischer@state.co.us" <alex.fischer@state.co.us>, "steven.mah@state.co.us" <steven.mah@state.co.us>, Tom Kirkwood <tomk@kirkwoodcompanies.com>, Scott Kerr <scottk@kirkwoodcompanies.com>

Dave,

Thank you for the email. After discussing the issue with Alex, we have agreed to stay all deadlines in the current NOAV (including the Rule 522.d.(2) NOAV Answer). Steven is on vacation. When he returns I will work with him to determine whether we will be issuing a second NOAV or amending the first. Alex told me that he would like to keep the two spills separate in the database and so will be expecting two Form 27s (even though portions of the reports will be identical). I suspect we will take a similar approach with the NOAVs. Please check back with me the first of next month.

Thanks,

Jeremy I Ferrin
Enforcement Officer

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On Fri, Jun 16, 2017 at 4:56 PM, Dave Weinert <davew@kirkwoodcompanies.com> wrote:

Jeremy:

Wesco is preparing the response to the above referenced NOAV. The corrective action dates for the NOAV range from June 23rd to June 30th, 2017.

On June 7th, 2017, during preparation of the response, Wesco experienced a second leak on the same buried line. The leak occurred approximately 20 feet south from the March, 2017 release referenced in the NOAV. The spill consisted of approximately 2 barrels of oil and 10 barrels of produced water. The spill path flowed over the same path as the March, 2017 spill and extended further down the drainage before being contained. . The spill was reported to the COGCC via email and a Form 19. A Form 19S has also been filed. On June 13th, 2017, Wesco staff met Alex Fischer and Kris Neidel at the release location. The spill has been mostly cleaned up with most of the oil recovered. Preparation of a second Form 19s is under way along with preparation of a Form 27. Monitoring is on-going. Sampling will be completed to verify the remediation.

Because of the overlapping nature of the second release, Wesco has questions regarding the NOAV response and are requesting your assistance to address the issues discussed below.

- Alex mentioned that it is likely Wesco will receive an NOAV for this second spill. Given the physical proximity of both the spill source (same flow line), release nearby locations and spill path, could the two NOAV's be combined into a single NOAV to expedite the process? This would also enable Wesco to provide a single response to the combine NOAV.
- The NOAV referenced above requested a Form 27 be submitted for the March spill. As discussed with Steven Mah, a Form 27 was submitted on March 17th, 2017. The Form 27 included a plan to collect a single soil sample. The scheduled sampling date was the June 8th, the day after the spill. In agreement with the COGCC staff, the sample was not collected. As discussed with Alex Fischer during the June 13th on site meeting, Wesco is requesting that the sample referenced in the March 17th, 2017 Form 27 be included with the soil samples required for the June 7th spill. In accordance with the COGCC approval, collection of the soil samples for the June 7th spill will be delayed until the drainage has dried and no surface water is present, likely in August or September.
- Wesco requests that the Supplemental Form 27 Site Investigation and Remediation Work Plan status reports requested on page 2 of the NOAV be combined for both spills into a single report.
- Wesco requests that the continued cleanup of impacted areas discussed on page 3 of the NOAV be combined with the cleanup of the June, 2017 spill.

Thanks you for your assistance.

Please feel free to call me with any questions.

Dave

Dave Weinert

HSE Coordinator

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



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