

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

401376445

Date Received:

08/31/2017

Spill report taken by:

LUJAN, CARLOS

Spill/Release Point ID:

451404

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: VANGUARD OPERATING LLCOperator No: 10531Address: 5847 SAN FELIPE #3000City: HOUSTONState: TXZip: 77057Contact Person: Scott Ghan

Phone Numbers

Phone: (970) 876-1959Mobile: (970) 744-8128Email: sgghan@vnrenergy.com

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 401341818Initial Report Date: 07/14/2017Date of Discovery: 07/12/2017Spill Type: Recent Spill

Spill/Release Point Location:

Location of Spill/Release: QTRQTR SESW SEC 36 TWP 6S RNG 92W MERIDIAN 6Latitude: 39.480040 Longitude: -107.619150Municipality (if within municipal boundaries): _____ County: GARFIELD

Reference Location:

Facility Type: WELL PAD☒ Facility/Location ID No 334624☐ 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): 0Estimated Condensate Spill Volume(bbl): 0Estimated Flow Back Fluid Spill Volume(bbl): 0Estimated Produced Water Spill Volume(bbl): UnknownEstimated Other E&P Waste Spill Volume(bbl): 0Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: _____

Land Use:

Current Land Use: OTHEROther(Specify): agriculturalWeather Condition: partly cloudy and 90 degreesSurface Owner: FEEOther(Specify): Miller Land and Cattle

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):

At approximately 1450 on July 12th, 2017, Vanguard personnel identified a produced water release near the edge of the location. Water was observed exiting the subsurface within an existing pipeline right-of way. The spill path moved downgradient to the northeast before terminating approximately 320' from the edge of location. The water pipeline within the right-of-way was shut-in and water was evacuated from the line until flow from subsurface ceased at the release point. Response activities continued into the evening and all visible standing water was removed from the spill path via vacuum truck. Several water bars were excavated within the spill path to capture any stormwater, if a precipitation event were to occur during the night. The COGCC visited the location with Vanguard representatives on July 13th and has approved of the planned investigation and remedial efforts. The investigation is ongoing and additional information will be provided in a supplemental report.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
7/12/2017	landowner	Marty Miller	-	approved of response activities
7/13/2017	Garfield County	Kirby Wynn	-	notified via email
7/12/2017	COGCC	Carlos Lujan	-	notified via voicemail and email

CORRECTIVE ACTIONS

#1	Supplemental Report Date: 08/15/2017
Cause of Spill (Check all that apply)	
<input type="checkbox"/> Human Error	<input checked="" type="checkbox"/> Equipment Failure
<input type="checkbox"/> Historical-Unknown	
<input type="checkbox"/> Other (specify) _____	
Describe Incident & Root Cause (include specific equipment and point of failure)	
<p>Based on the investigation and the analytical results from the soil samples collected from the excavation, this release appears to have been short-lived and likely detected by Vanguard staff within several hours of the start of the release. The release originated at a subsurface produced water pipeline near the edge of the location and the determined cause of the release appears to have been related to internal corrosion. The pipeline is a 6 inch, fusion bonded epoxy coated, carbon steel pipe with welded connections. On 7/13/2017, characterization samples were collected to define the release area and any potential impacts to soil or surface water. Three soil samples were collected from within the release path and one point of compliance sample was collected down gradient of the terminus of the release path. Additionally, two surface water samples were collected from West Divide Creek; one upgradient of the release area and one down gradient of the release area. All samples were submitted for laboratory analysis of constituents identified in COGCC Table 910-1. Laboratory analytical results indicated Table 910-1 compliance with the exception of EC, pH and SAR. Mr. Carlos Lujan (COGCC) determined that no further remediation or additional sampling of the release path was necessary. The release path and sample locations are depicted on the attached Figure 2. All laboratory analytical reports are included as an attachment and summarized in the attached tables. Soil samples SP-01 and SP-02 were collected within the up-gradient portion of the spill path and are within an active stormwater diversion ditch with associated sediment traps. The exceedances of COGCC Concentration Levels for EC, pH and SAR in these sample locations will be remediated via natural attenuation; ongoing maintenance of the BMPs; or during the final reclamation of the production facility. These reclamation based parameters are not threatening vegetative growth within this active BMP system.</p>	
Describe measures taken to prevent the problem(s) from reoccurring:	
<p>On 7/18/2017, excavation activities occurred around the release point. A very small hole in the pipe was identified directly below the point where the water was observed coming from the subsurface. The damaged section of pipeline which caused the release was then repaired. Soil confirmation samples were collected from the sidewalls and base of the excavation and submitted for laboratory analysis of constituents identified in COGCC Table 910-1. Laboratory analytical results of excavation confirmation samples indicated Table 910-1 compliance with the exception of pH and SAR. The excavation extent and soil confirmation sample locations are depicted on the attached Figure 3.</p> <p>On 8/1/2017, a composite sample was collected from the soil that was removed from the excavation and submitted for laboratory analysis of constituents identified in COGCC Table 910-1. Laboratory analytical results indicated Table 910-1 compliance with the exception of EC, SAR and pH. Per the written approval of the COGCC (see attached email), Vanguard incorporated this excavated soil into the perimeter berm at the site. All laboratory analytical reports are included as an attachment and summarized in the attached tables. As a result of this incident, the pipeline was properly abandoned on 7/26/2017, as referenced in the COGCC approved Form 42 (Doc. No. 401353233). Vanguard also communicated with the COGCC Integrity Group, as directed in the COA, and received confirmation from Mark Schlagenhauf that he did require any additional information regarding this incident. A copy of the email correspondence with the Integrity Group has been included as an attachment.</p>	
Volume of Soil Excavated (cubic yards): 10	
Disposition of Excavated Soil (attach documentation)	
<input type="checkbox"/> Offsite Disposal	<input type="checkbox"/> Onsite Treatment
<input checked="" type="checkbox"/> Other (specify) onsite use	
Volume of Impacted Ground Water Removed (bbls): 0	
Volume of Impacted Surface Water Removed (bbls): 0	
<h3 style="margin: 0;">REQUEST FOR CLOSURE</h3> <p>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.</p> <p>Basis for Closure:</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> Corrective Actions Completed (documentation attached)</p> <p style="margin-left: 20px;"><input type="checkbox"/> Work proceeding under an approved Form 27</p> <p style="margin-left: 20px;">Form 27 Remediation Project No: _____</p>	
OPERATOR COMMENTS:	
Please route to Carlos Lujan.	
<p>I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.</p> <p>Signed: _____ Print Name: Scott Ghan</p> <p>Title: Senior EHS Specialist Date: 08/31/2017 Email: sghan@vnrenergy.com</p>	

COA Type**Description**

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

401376445	SPILL/RELEASE REPORT(SUPPLEMENTAL)
401376711	TOPOGRAPHIC MAP
401376712	SITE MAP
401376715	SITE MAP
401376718	ANALYTICAL RESULTS
401376722	ANALYTICAL RESULTS
401376723	ANALYTICAL RESULTS
401376759	ANALYTICAL RESULTS
401376771	OTHER
401380400	OTHER
401392440	FORM 19 SUBMITTED

Total Attach: 11 Files

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

Environmental	Based on review of information presented it appears that no further action is necessary at this time, and COGCC approves the closure request. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be significantly impacted, then further investigation and/or remediation activities may be required at the site.	08/31/2017
Environmental	From the Corrective Action Report Tab: "Soil samples SP-01 and SP-02 were collected within the up-gradient portion of the spill path and are within an active stormwater diversion ditch with associated sediment traps. The exceedances of COGCC Concentration Levels for EC, pH and SAR in these sample locations will be remediated via natural attenuation; ongoing maintenance of the BMPs; or during the final reclamation of the production facility. These reclamation based parameters are not threatening vegetative growth within this active BMP system."	08/31/2017
Environmental	Pipeline integrity group was notified by Vanguard. No additional information was required regarding pipeline operations.	08/31/2017

Total: 3 comment(s)