

# 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:

401881830

Date Received:

06/26/2019

Spill report taken by:

FISCHER, ALEX

Spill/Release Point ID:

458284

## 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: TEP ROCKY MOUNTAIN LLC	Operator No: 96850	<b>Phone Numbers</b>
Address: PO BOX 370		Phone: (970) 263-2760
City: PARACHUTE	State: CO Zip: 81635	Mobile: (970) 623-4875
Contact Person: Michael Gardner		Email: mgardner@terraep.com

### INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 401807278

Initial Report Date: 10/23/2018 Date of Discovery: 10/22/2018 Spill Type: Recent Spill

#### Spill/Release Point Location:

Location of Spill/Release: QTRQTR NWSE SEC 24 TWP 1S RNG 98W MERIDIAN 6

Latitude: 39.947306 Longitude: -108.339316

Municipality (if within municipal boundaries): County: RIO BLANCO

#### Reference Location:

Facility Type: WELL PAD ☒ Facility/Location ID No 335724  
 Spill/Release Point Name: ☐ No Existing Facility or Location ID No.  
 Number: ☐ 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: Total estimated spill volume is ~ 45 bbls

#### Land Use:

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

Weather Condition: Overcast, cool, breezy, light rain

Surface Owner: FEDERAL Other(Specify):

#### 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):

A subcontract water hauler failed to pull a water blow-down tank as scheduled, and as a result, the tank overflowed into an earthen secondary containment structure on the pad. The earthen secondary containment structure contained most of the release, but an estimated 5 bbls seeped through the containment structure and onto the pad surface. All fluids were contained on the pad. A vac-truck was dispatched to the site recovered approximately 25 bbls of standing fluid from the containment and small puddles outside of the containment. Root cause of the incident is human error. All impacted soils will be excavated and evaluated for potential on-site landfarming. If soils cannot be managed on-site, they will be transported for off-site disposal at an approved disposal facility.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
10/23/2018	COGCC	Stan Spencer	970-987-2891	Initial Form 19 and email notification
10/23/2018	BLM	Tracy Prefors	970-317-1534	Email notification
10/23/2018	Lanny Massey	Rio Blanco County	970-878-9586	Email notification
10/23/2018	Steve Allen	Meeker Fire and Rescue	970-756-0990	Email notification

Was there a Grade 1 Gas Leak associated with this E & P waste spill or release?

Yes ☐ No ☒

If YES, enter the Document Number of the Initial Grade 1 Gas Leak Report Form 44:

Was there a reportable accident associated with this E & P waste spill or release?

Yes ☐ No ☒

If YES, enter the Document Number of the Initial Accident Report, Form 22:

SPILL/RELEASE DETAIL REPORTS

#1

Supplemental Report Date: 12/20/2018

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	45	25	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>

specify:

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

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

A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit

Impacted Media (Check all that apply) ☒ Soil ☐ Groundwater ☐ Surface Water ☐ Dry Drainage Feature

Surface Area Impacted: Length of Impact (feet): 55 Width of Impact (feet): 33

Depth of Impact (feet BGS): 1 Depth of Impact (inches BGS):

How was extent determined?

Visual observations, field screen readings (PID & PetroFlag), and confirmation analytical data

Soil/Geology Description:

OH - organic clay/silt

Depth to Groundwater (feet BGS) 477 Number Water Wells within 1/2 mile radius: 2

If less than 1 mile, distance in feet to nearest Water Well 3283 None ☐ Surface Water          None ☒

Wetlands          None ☒ Springs          None ☒

Livestock          None ☒ Occupied Building          None ☒

Additional Spill Details Not Provided Above:

A dry ephemeral drainage lies approximately 2530 ft to the west. Water well construction report for a well located 3,283 ft to the northeast (permit #32722-MH) indicates ground water is at 477 ft. Impacted soils were excavated 10-12" below ground surface where field screening indicated soils satisfied COGCC Table 910-1 concentrations and confirmation samples were collected on 10/26/18 from the footprint of the excavation at the three locations noted in the attached sample location map, as well as from the stockpiled material. Results indicate that the soils within the excavation satisfy COGCC Table 910-1 thresholds, with the exception of arsenic, which are the same or below background concentrations, and SAR on the southern sample, which exceeds by 1 unit. The results from the excavated spoils stockpiled on location indicated the material exceeded for TPH and electrical conductivity. The spoils pile was stockpiled on location and thoroughly mixed together, making a homogenous mixture of the excavated material. The spoils stockpile was re-sampled on 11/27/18 to determine hydrocarbon concentrations and evaluate the landfarming options and treatment. Sample results received on 11/27/18 indicated that the soils no longer exceeded Table 910-1 and treatment using enhanced bioremediation product was not needed.

## CORRECTIVE ACTIONS

#1 Supplemental Report Date: 12/20/2018

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)

A subcontractor water hauler forgot to pull the fluids from the blow-down tank as scheduled, resulting in the tank overflowing. 45 bbls of produced water was released into the earthen secondary containment, of which 25 bbls were recovered. The two (2) 400 bbl tanks that were temporarily placed on location to facilitate production while the pad was being reclaimed have been removed.

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

Reinforce importance of following schedules for pulling tanks with subcontractor. Request corrective action plan from contractor to make sure this type of incident does not happen again.

Volume of Soil Excavated (cubic yards): 30

Disposition of Excavated Soil (attach documentation) ☐ Offsite Disposal ☐ Onsite Treatment

☐ Other (specify)         

Volume of Impacted Ground Water Removed (bbls): 0

Volume of Impacted Surface Water Removed (bbls): 0

## 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:

Please forward to Jim Hughes – This is a follow-up Supplemental Form 19 to the previously submitted Supplemental Form 19 submitted on 11/9/18 (401823254)

Attached to this Supplemental Form 19 is the spoils pile (excavated material) analytical data after the stockpiled material was re-sampled. A representative sample was collected on 11/27/18 from the stockpiled material to determine actual concentrations of the soil to establish baseline concentrations and if landfarming would be economical. Results indicated that the excavated spoils stockpiled satisfied COGCC Table 910-1 and landfarm was not conducted.

During reclamation, the exceeding SAR concentration within the excavation will be capped with a minimum of 3ft of native cover as outlined the COGCC FAQ #32. Additionally, arsenic analysis within the excavation samples are consistent with background concentrations, which Terra is requesting consideration as outlined in COGCC FAQ #31.

Terra is requesting closure of the RGU 33-24 release (Spill ID 458284).

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

Signed: \_\_\_\_\_ Print Name: Michael Gardner  
Title: TEP Environmental Date: 06/26/2019 Email: mgardner@terraep.com

**COA Type****Description**

	As stated in the response to FAQ #31, "an operator need not meet a concentration level specified in Table 910-1 if the operator can demonstrate to the COGCC's satisfaction that the Table 910-1 level is exceeded by the background level in the native soils or ground water, as applicable." Background sample results shall be used to demonstrate native soil concentration levels and the operator shall provide a detailed explanation as to why the concentration levels listed in Table 910-1 cannot be met. The operator shall then be required to meet the concentration levels determined to exist in the native soil/groundwater, with prior approval by the COGCC.
	The operator has stated, "Analytical results comply with COGCC Table 910-1 standards. The spoils material will be used for reuse on location." The analytical report attached to this supplemental spill report contains exceedances of Table 910-1.
	On Supplemental Spill Report Document #401823254 it was stated, "Provide confirmation lab analyses with a site plan showing locations, depths and concentrations of Table 910-1 constituents. If any concentrations exceed Table 910-1 and cannot be removed, provide F-27 remediation plan." Preliminary lab results indicated exceedances of Table 910-1 and no final report has been received.

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

401881889	ANALYTICAL RESULTS
401881894	SITE MAP
401974558	ANALYTICAL RESULTS
402085788	ANALYTICAL RESULTS

Total Attach: 4 Files

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

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)