

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:
402213856

Date Received:
11/26/2019

Spill report taken by:
Hughes, Jim

Spill/Release Point ID:
468098

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>LARAMIE ENERGY LLC</u>	Operator No: <u>10433</u>	Phone Numbers
Address: <u>1401 SEVENTEENTH STREET #1401</u>		Phone: <u>(970) 812-5310</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>(970) 985-5383</u>
Contact Person: <u>Wayne P Bankert</u>		Email: <u>wbankert@laramie-energy.com</u>

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 402189088

Initial Report Date: 09/25/2019 Date of Discovery: 09/24/2019 Spill Type: Recent Spill

Spill/Release Point Location:

Location of Spill/Release: QTRQTR SWNE SEC 17 TWP 10S RNG 94W MERIDIAN 6

Latitude: 39.190407 Longitude: -107.903452

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

Reference Location:

Facility Type: WELL PAD Facility/Location ID No 159232

Spill/Release Point Name: My Way 17-2 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): <u>0</u>	Estimated Condensate Spill Volume(bbl): <u>0</u>
Estimated Flow Back Fluid Spill Volume(bbl): <u>0</u>	Estimated Produced Water Spill Volume(bbl): <u>>=5 and <100</u>
Estimated Other E&P Waste Spill Volume(bbl): <u>0</u>	Estimated Drilling Fluid Spill Volume(bbl): <u>0</u>

Specify: _____

Land Use:

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

Weather Condition: Dry 85 deg F

Surface Owner: FEE Other(Specify): Laramie energy, LLC

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):

Off load line valve was not fully closed by pumper during fluid transfer operations. Fluid was released at a low rate. Volume of release was 14.8 bbls, confirmed via SCADA readings from the tank. No fluid was recovered. The fluids migrated from the concrete loadout (impervious) surface to the soils around the concrete and were absorbed. Soil sample collection will be performed as soon as staff can be scheduled. No anticipated impacts to surface or ground water. the spill was confined to the pad surface in proximity to the storage tanks.

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
9/25/2019	MesaCo LGD	Jeff Hofman	-	Acknowledged

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: 10/19/2019

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	14	0	<input checked="" 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): 68 Width of Impact (feet): 40

Depth of Impact (feet BGS): 0 Depth of Impact (inches BGS): _____

How was extent determined?

Field Screening with a PID and excavating sample sites with Excavator.

Soil/Geology Description:

Cerro Silty Clay Loam 6-12 % sLopes. Pad surface is Pit(8" minus) down to 24 -36". Native soils extremely tight clays below

Depth to Groundwater (feet BGS) 30

Number Water Wells within 1/2 mile radius: 14

If less than 1 mile, distance in feet to nearest

Water Well	<u>3189</u>	None <input type="checkbox"/>	Surface Water	<u>233</u>	None <input type="checkbox"/>
Wetlands	_____	None <input checked="" type="checkbox"/>	Springs	_____	None <input checked="" type="checkbox"/>
Livestock	_____	None <input checked="" type="checkbox"/>	Occupied Building	<u>2962</u>	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Open Range, Livestock in area not in proximity to pad. Depth to GW based on Irrigation Ditch 233 feet North of Pad. No springs identified. Number of Water wells within 1/2 mile are all Permitted Monitoring Holes. Nearest is 672' SW. Actual water well 3189' SE (Permit No. 189440)

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 10/19/2019

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)

After offloading produced water, driver closed valve to tanks and left site. Valve had not closed completely and slowly leaked produced water out on ground. Valve and Backflow valves were inspected for damage.

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

Laramie re-inforced policy with water hauler to be more observant when conducting operations, especially at nights when no other personnel are present. Drip pans will be used for any leaking fittings at the truck end. Laramie is re-evaluating layout of facility and offload procedures to determine if there are any actions that might prevent future incidents, or reduce impacts if another spill occurs.

Volume of Soil Excavated (cubic yards): 1066

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:

NOTE: No Material has been excavated. Laramie will prepare a plan week of 10/21/19 and submit on Form 27.

Summary of work done:

First set of samples occurred on September 26, 2019. Those samples confirmed a release in the shallow soil to the north and east of the concrete pad (see lab report L1144054 and sample locations SS1 and SS2 in the Sample Locations figure and Preliminary Soil Sampling Summary for location and results).

On October 10, 2019 Entrada sampled with the aid of an excavator:

- . Field screening was performed with a PID Excavations adjacent to the east and west of the concrete pad showed elevated volatile organic readings throughout much of the gravel/pit-run base,
- . The base was excavated, and native soil was sampled in the described locations,
- . The native soil is a very tight clay,
- . Impacted areas appear to extend approximately 20' north of the concrete pad,
- . Elevated PID readings were identified off the southeast corner of the concrete pad. The readings increased with depth (up to 10' below grade) and a small light grey stain in native soil was observed at approximately 30-36" below grade,
- . A soil vent was installed to a depth of approximately 10'. The lower 18" of the vent consists of 1/2" drilled holes in a 4" diameter PVC pipe and 1" gravel placed around the vent. The native soils were returned to the excavation (see photos),
- . The elevated soil PID readings at E1 are likely historical in nature,
- . Surface water was sufficiently distant to not require sampling (irrigation ditch located approximately 1300 feet west of the location),

Note: Ditch 233' North (Will check for Running water WPB)

- . The pit run was saturated in the southwest corner during excavation in the vicinity of W1,
- . Water was present in small quantities, but not enough water to collect a sample accumulated in any of the depressions made to collect water,
- . Insufficient water was present in the E1 location the following day (October 11, 2019),
- . Due to the size of the excavator, no samples were collected on the south side of the concrete pad,
- . Laboratory data is incomplete with no VOCs and some chemistry parameters not reported (as of 10/18/2019)

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

Signed: _____ Print Name: Wayne P Bankert
 Title: Reg & Env. Manager Date: 11/26/2019 Email: wbankert@laramie-energy.com

COA Type	Description
	<p>Operator's report indicates that the location was excavated and backfilled, but operator has not provided soil confirmation samples from beneath the former concrete pad to delineate vertical extent of impacts.</p> <p>Additional site investigation is required to assess for impacts beneath the former concrete pad area. Operator shall submit an eForm 27 Site Investigation and Remediation Workplan to define vertical and aerial extents of soil impacts.</p>
	<p>Analytical results for all samples exceed Table 910-1 for arsenic (doc #402219986). Operator has neither attached laboratory report nor provided a location for background sample BG-E PT 92 12 IN.</p> <p>Operator shall provide laboratory reports for background sample BG-E PT 92 12 IN and shall provide a site diagram that depicts the sample location with respect to the My Way Ranch 17-2 pad. Operator shall address arsenic exceedances of Table 910-1.</p>
	<p>Per COA on Initial and Supplemental eForms 19 (docs #402189088 & #402196686), "operator shall make a sensitive area determination to evaluate the potential for impacts to ground water or surface water."</p> <p>Submit an eForm 27 Site Investigation and Remediation Workplan to outline and document planned Sensitive Area Determination no later than 12/13/2019, as required by Field Inspection Report #698100088. Operator's eForm 27 shall comply with Rules 901.e and 910.b.(4) and shall provide a detailed implementation schedule.</p>

Attachment Check List

Att Doc Num	Name
402213856	SPILL/RELEASE REPORT(SUPPLEMENTAL)
402214902	ANALYTICAL RESULTS
402214903	AERIAL PHOTOGRAPH
402214904	ANALYTICAL RESULTS
402214905	SITE MAP
402219969	SITE MAP
402219971	ANALYTICAL RESULTS
402219981	ANALYTICAL RESULTS
402219986	ANALYTICAL RESULTS
402220059	OTHER
402256190	FORM 19 SUBMITTED

Total Attach: 11 Files

General Comments

User Group	Comment	Comment Date
Environmental	9/26 Lab Reports uploaded twice as docs #402219971 and #402214902.	12/03/2019
Environmental	Photo titled MWR 17-2 W1 (36"), doc #402220059, depicts saturated soils at depth beneath the concrete pad as well as expansion joints built into the pad itself. Expansion joints may act as conduits for flow of released fluids into the subsurface beneath the concrete pad.	12/03/2019

Environmental	Report Detection Limits for benzo(a)pyrene and dibenz(a,h)anthracene (0.12 mg/kg) exceed COGCC 910-1 maximum allowable concentrations for both analytes (0.022 mg/kg) for 9/26/2019 sample MWR 17-2 SS1 (doc #402214902). This location was resampled as MWR 17-2 N3 and N4 at 24" depth on 10/10/2019 with RDLs below Table 910-1.	12/03/2019
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Total: 3 comment(s)