

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402260050

Date Received:

03/05/2020

Spill report taken by:

FISCHER, ALEX

Spill/Release Point ID:

468737

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) 263-3641</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>		Mobile: <u>()</u>
Contact Person: <u>Joan Proulx</u>		Email: <u>jproulx@laramie-energy.com</u>

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 402206312

Initial Report Date: 10/10/2019 Date of Discovery: 10/09/2019 Spill Type: Recent Spill

Spill/Release Point Location:

QTRQTR Lot 12 SEC 4 TWP 6S RNG 97W MERIDIAN 6

Latitude: 39.557414 Longitude: -108.218862

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

Reference Location:

Facility Type: WELL PAD Facility/Location ID No 335902
 Spill/Release Point Name: CC 604-41-32 Well API No. (Only if the reference facility is well) 05- -
 No Existing Facility or Location ID No.

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: Produced Water used for Well Stimulation(Completions)

Land Use:

Current Land Use: NON-CROP LAND Other(Specify): _____
 Weather Condition: Cloudy Overcast
 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):

While rigging down completion equipment, contractor failed to follow procedure and drained lines from manifold onto ground. Normal operating procedure is to vacate lines with a wter truck prior to disconnecting from manifold. Contractor Negligence!!

List Agencies and Other Parties Notified:

OTHER NOTIFICATIONS

Date	Agency/Party	Contact	Phone	Response
10/10/2019	Garfield county	Kirby Wynn	970-987-2557	Clean up Per COGCC Rules
10/10/2019	COGCC	Alex Fischer	-	E-mail Notification
10/10/2019	COGCC	Steven Aruaza	-	E-Mail Notification

Was there a Grade 1 Gas Leak? Yes No

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

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? Yes No

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

Was there damage during excavation? Yes No

If YES, was CO 811 notified prior to excavation? Yes No

SPILL/RELEASE DETAIL REPORTS

#1 Supplemental Report Date: 12/11/2019

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	0	0	<input type="checkbox"/>
DRILLING FLUID	10	10	<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): 66 Width of Impact (feet): 66

Depth of Impact (feet BGS): 1 Depth of Impact (inches BGS): 12

How was extent determined?

Extent of impact was mapped with Trimble equipment and then downloaded to GIS. Since the area is irregular the length and width is based on the square footage(4395) as mapped in GIS. The depth of impact is estimated at 12 inches or less. Depth is based on excavation of material until no impacted material was found. Discrete soil samples were collected after the impacted soils were removed. The sample locations were pre-screened using PID and olafactory assessment. Soils were continually assessed for impacts during excavation using PID. Samples were collected from excavated areas deemed to be free from residual impacts.

Soil/Geology Description:

Spill was on well pad. Soil impacted was gravel and native soils used for pad construction

Depth to Groundwater (feet BGS) 30

Number Water Wells within 1/2 mile radius: 0

If less than 1 mile, distance in feet to nearest

Water Well _____ None

Surface Water 721 None

Wetlands _____ None

Springs _____ None

Livestock _____ None

Occupied Building _____ None

Additional Spill Details Not Provided Above:

A sample of source fluids was collected and analyzed, data is attached. The release was fully contained within the working pad surface. Horizontal and vertical extent of release was identified. The impacted area was excavated, impacted soils were hauled to a licensed disposal facility. Samples were collected during the (immediate) clean up of the release in the area that was excavated. Analytical data from sampling of the area subsequent to soil removal demonstrates compliance with Table 910-1 criteria except for: Arsenic, SAR and EC. Because this is a working pad surface, the exceedances of Arsenic, SAR and EC will be addressed via adherence to FAQ 31 & 32 at the end time of Final Reclamation.

CORRECTIVE ACTIONS

#1 Supplemental Report Date: 12/11/2019

Root Cause of Spill/Release Incorrect Operations (Human Error)

Other (specify) _____

Type of Equipment at Point of Spill/Release: Manifold Piping

If "Other" selected above, specify or describe here:

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

Contractor failed to follow procedure during rig down of completion equipment. Normal operations is to evacuate all water out lines and manifolds prior to breaking loose and rigging down. Contractor appeared to have broken lines loose with water still in them. As these lines and manifolds are before the pumps, the water in the lines was produced water only.

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

Laramie conducted an investigation as to why the procedure was not followed. This resulted in the contractor implementing a work Procedure and Checklist for future operations.

Volume of Soil Excavated (cubic yards): 163

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:

This submittal is intended to provide closure to Release 468737. It is also intended to accommodate Conditions of Approval detailed in document 402206312 and 402213844. The soils that were impacted by this spill were removed. Disposal tickets are attached to this submittal. The delineated area was resampled and the location demonstrated compliance with Table 910-1 criteria except for Arsenic, SAR and EC. Laramie is requesting relief from these constituents via FAQ 31 and 32 at the time of facility closure.

3/5/2020: This Form 19 would not allow me to delete the previously submitted documents. Lab report L1149400 for samples collected

10/11/2019 is attached, as well as the corrected Sampling Summary Table.

The Arsenic values on the summary table are consistent with the background samples of locations in near proximity to the 604-41-32 pad. Attached is "697-03-07 Initial Soil Sample" indicates an Arsenic level of 4.07, with a highlighted comment at the bottom of the page which indicates a background Arsenic reading 5.1 mg/kg at the 604-44 pad (2,434' south of the 604-41-32 pad). The 697-03-07 pad is 3,532' east of the 604-41-32 pad.

Also attached is "604-12-13 Spill Response" which indicates Arsenic levels of 2.09 and 4.22, located 3,687' west of the 604-41-32.

The exceedances of Arsenic, SAR and pH are within the pad boundary and will be addressed as per the COGCC FAQ 31 and FAQ 32 details at the time of pad closure.

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

Signed: _____ Print Name: Joan Proulx
 Title: Regulatory Analyst Date: 03/05/2020 Email: jproulx@laramie-energy.com

<u>COA Type</u>	<u>Description</u>
	Operator has not addressed arsenic concentrations exceeding Table 910-1. Background concentration of 2.74 is exceeded by many samples.
	Laboratory Reports are still missing for Soil Samples collected on 10/11/2019 (SS1-0-6"-1115, SS2-8-6"-1120, and BG1-0-6"-1310).

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402260097	ANALYTICAL RESULTS
402260513	SITE MAP
402260522	OTHER
402260523	OTHER
402260534	ANALYTICAL RESULTS
402260555	OTHER
402260564	OTHER
402275984	ANALYTICAL RESULTS
402278854	ANALYTICAL RESULTS
402333228	ANALYTICAL RESULTS
402333232	ANALYTICAL RESULTS
402333239	OTHER
402333241	OTHER

Total Attach: 13 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Attached Analytical Summary Table (doc #402278854) does not highlight Table 910-1 exceedances for EC for Samples SS1-0-6"-1115 and SS2-0-6"-1120.	01/14/2020
Environmental	Soil sample analytical summary table has been uploaded twice (docs #402260097 and #402278854).	01/14/2020
Environmental	Analytical results for Produced Water sample have been attached twice (docs #402260522 and #402275984)	01/14/2020
Environmental	12/18/2019: Lab reports missing for 10/11/2019 samples. Revise Analytical Summary Table to correct EC/pH Operator has not established background conditions for As or SAR or pH. Lab results for 10/16/2019 samples reported 10/10/2019	12/18/2019

Total: 4 comment(s)