



Comp# 200448619  
NOAV# 402206828  
Doc# 1309804  
Date: 04/01/2020

1120 Lincoln Street, Suite 801  
Denver, CO 80203

March 31, 2020

Louis Conrad Migneault  
BCL Colorado LP  
9601 Katy Freeway, Suite 475  
Houston, TX 77024

Re: COGCC Complaint (Document #200448619)  
Grant Tank Battery (COGCC Facility ID #446608)  
NE ¼ Section 26, Township 2 North, Range 68 West  
Frederick, Colorado

Dear Mr. Migneault,

On February 4, 2020, the Colorado Oil & Gas Conservation Commission (COGCC) received your complaint concerning both engineering (flowline) and environmental issues at the subject location. This letter is in response to the environmental issues. You will receive a separate response regarding the engineering issues.

The COGCC wrote to you on November 22, 2019 regarding your original complaint (Document #200446391) about environmental issues at the Grant Tank Battery. That letter included a timeline of COGCC inspections and enforcement actions, all done in response to your complaint, culminating with the COGCC issuing a Notice of Alleged Violation (NOAV), Document #402206828, to KP Kaufman Company, Inc. (KPK) on October 16, 2019.

KPK subsequently submitted a COGCC Form 19 (Spill/Release Point 469224) and Form 27 (Remediation Project (REM) 15157), both of which were listed in the NOAV as abatement actions. There are now two active site investigation and remediation projects at the Grant Tank Battery, REM 12158 (begun in response to your original complaint) and REM 15157 (required by COGCC Rule 905.b for removal of a partially buried produced water vessel).

The COGCC's ability to influence the implementation of the above-mentioned remediation projects begins with applying Conditions of Approval (COAs) to the operator's submittals and listing Corrective Actions (CAs) on our field inspections. The COGCC establishes deadlines for COAs and CAs. If the operator does not meet those deadlines, the COGCC can initiate an enforcement action against the operator.



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The records for both remediation projects and the NOAV are available on the COGCC website at <https://cogcc.state.co.us>. From the homepage, click on "Data" and then click "Inspection/Incident". On the inspection/incident inquiry page, click the radio button for "NOAV" and enter the above-mentioned NOAV document number. You can track the remediation projects by selecting the radio button for "Remediation" on the Inspection/Incident Inquiry page and entering either "12158" or "15157" in the field named "Remediation Project Number".

Further action relating to your complaint will be addressed through the subject NOAV and remediation projects. Accordingly, the COGCC has closed your complaint. As a complainant, you may have the right to comment on a draft proposed settlement of the NOAV, once that document is available. Your rights as a complainant are outlined in COGCC Rule 522. The COGCC Hearings staff will contact you as appropriate.

If you have questions or comments concerning the NOAV, please contact the COGCC NOAV Specialist Trent Lindley at [trent.lindley@state.co.us](mailto:trent.lindley@state.co.us). If you have questions related to the site investigations and remediation or the resolution of your complaint, please contact me.

Sincerely,  
Colorado Oil and Gas Conservation Commission

*Chris Canfield*

Chris Canfield, P.G.  
Environmental Protection Specialist

Cc: John Axelson - COGCC Acting Environmental Manager  
Rick Allison - COGCC Acting East Environmental Supervisor  
Trent Lindley - COGCC Enforcement Specialist  
Megan Adamczyk - COGCC Complaint Specialist  
Mark Schlagenhauf - COGCC Engineering Integrity Supervisor  
Steven Louis-Prescott - Attorney representing Mr. Migneault