

Form 19 Supplemental
Doc No. 4024258778
Spill Release No. 476992
Spill Volume Update
and
Preliminary Response to COA's

Disclaimer: The information included here-in is subject to change as additional data and results are collected by Laramie and outside contractors.

SPILL VOLUME UPDATE: Total volume leaked 8 bbls produced water. 6 bbls recovered and place back in tanks, two barrels outside containment.

Delineate horizontal and vertical extent of impacted area and remediate impacts to Table 910-1 standards. Provide documentation in either a Supplemental eForm 19 if cleaned up immediately and/or Initial eForm 27 if additional site investigation and remediation is required OR if groundwater is encountered during cleanup operations. Documentation must include a figure showing spill area with sample locations plus laboratory results.

Laramie Response:

Horizontal extent (~293 sq. ft.) of spill and sample points outside containment are identified on attached exhibit and photos. Initial Soil samples were taken 6/18/2020. Sample analysis and results have not been received by Laramie as lab turn around time is up to 14 days. Results will be submitted once received. Spill remained on location and did not impact any surface waters or ground water. Exhibits are being prepared to illustrate closest surface water down gradient of Piceance 28-05 pad.

In the Supplemental eForm 19, identify the root cause of the failure and explain how reoccurrence on this production equipment and other tanks associated with this pad will be prevented, per Rule 906.d.(2).

Laramie Response:

Root cause of failure was corrosion in the pipe fitting (See Doc. No. 402425808) exiting the tank prior to the load line valve. The liner compromise appears a lack of sufficient sand padding under the liner and pad gravel allowing a hole to be worn through liner after repeated rubbing of the pea gravel on top of the liner and the rocks underneath. Four of the tanks were pulled the week of 6/20/20 and the containment was pulled and reduced in size to hold four tanks due to the decreased production on the pad. The liner was pulled back 6/24/20 and the 3rd party contractor is scheduled for 6/29/20 to return to the pad and investigate liner footprint for potential impacts to the soils.

The tank was one of the four removed and in the future heavier gauge fittings will be used exiting tanks and between valves. Regarding the liner, liner padding will be of sufficient size to insure separation between the liner and the pad gravel.