

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

402579125

Date Received:

01/20/2021

Spill report taken by:

Hughes, Jim

Spill/Release Point ID:

478872

**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: KINDER MORGAN CO2 CO LP | Operator No: 46685 | <b>Phone Numbers</b>                         |
| Address: 1001 LOUISIANA ST SUITE 1000     |                    | Phone: (970) 882-5532                        |
| City: HOUSTON State: TX Zip: 77002        |                    | Mobile: (970) 403-9501                       |
| Contact Person: Michael Hannigan          |                    | Email: co2source_regulatory@kindermorgan.com |

**INITIAL SPILL/RELEASE REPORT**

Initial Spill/Release Report Doc# 402560568

Initial Report Date: 12/26/2020 Date of Discovery: 12/26/2020 Spill Type: Recent Spill

**Spill/Release Point Location:**

QTRQTR SENW SEC 20 TWP 37N RNG 18W MERIDIAN N

Latitude: 37.452886 Longitude: -108.858160

Municipality (if within municipal boundaries): County: MONTEZUMA

**Reference Location:**

Facility Type: TANK BATTERY  Facility/Location ID No 450901  
 Spill/Release Point Name: YC Cluster Produced Water Tank  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? No  
 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: 22 barrels of produced water inside secondary containment

**Land Use:**

Current Land Use: NON-CROP LAND Other(Specify):  
 Weather Condition: Sunny, clear, 32 deg F, no wind  
 Surface Owner: FEDERAL Other(Specify): BLM: CANM

**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 valve on Tank T-501 started leaking slowly overnight. The operator checked the tank levels when he reported for work in the morning and noticed that the produced water level in T-501 had dropped from 7.9' to 7.1' overnight. He went to the YC Cluster to check and discovered the release. The entire release, which was calculated using tank levels to be 22 barrels, was contained within the secondary containment berms. A water truck was called to pump out the remaining produced water from the tank, plus any standing water in the containment area, and haul it to the disposal well. A roustabout crew was called to remove ice (some of the produced water froze overnight) and place it in a containment area at the Yellow Jacket CPF where it would melt into a sump tank.

**List Agencies and Other Parties Notified:**

**OTHER NOTIFICATIONS**

| <u>Date</u> | <u>Agency/Party</u> | <u>Contact</u> | <u>Phone</u> | <u>Response</u>    |
|-------------|---------------------|----------------|--------------|--------------------|
| 12/26/2020  | BLM                 | Jen Jardine    | 970-385-1242 | Notified via email |
| 12/26/2020  | BLM                 | Laura Hartman  | -            | Notified via email |

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

**CORRECTIVE ACTIONS**

#1 Supplemental Report Date: 01/20/2021

Root Cause of Spill/Release Equipment Failure

Other (specify)

Type of Equipment at Point of Spill/Release: Other

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

3-inch load valve

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

The release was discovered by a Kinder Morgan CO2 Company, L.P. (KMCO2) plant operator at 8:20 AM on December 26, 2020. Upon reporting for duty at the Yellow Jacket Central Processing Facility (CPF), he reviewed several data trend charts related to various process vessels and equipment. The chart for the YC Cluster facility T-501 (produced water tank) fluid level indicated that overnight the level had dropped from 7.9 feet to 7.1 feet. Knowing that the water level should have been static overnight, the operator drove to the YC Cluster facility and performed a visual check which led to the discovery of the release. The release originated from the truck transfer valve of produced water tank T-501 located at the YC Cluster facility (Latitude 37.452886 N, Longitude -108.858160 E). The release occurred due to a worn interior seal of the 3-inch valve which resulted in a very slow leak. The leak was stopped when the operator called for a vacuum truck to transfer the produced water remaining in the tank to the Yellow Jacket disposal well. A bucket was placed under the leaking valve to catch the dripping water and a roustabout crew was called to remove the slabs of ice that had formed on the soil surface of the secondary containment area surrounding the tank. The ice was taken to the Yellow Jacket CPF where it was placed in a concrete containment area where it melted and drained into a waste sump. Based on the overnight drop in the T-501 fluid level, the total release volume was calculated to be 22 barrels. Approximately two (2) barrels of produced water were recovered, which includes the ice that was removed from the secondary containment area. Approximately 19 barrels of produced water were absorbed into the soil of the secondary containment area. One soil sample was collected from the area impacted by the spill at a depth of approximately two feet below ground surface.

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

An annual task to physically inspect transfer valves for leaks was developed following a similar release in January 2019. In order to minimize the magnitude of similar releases in the future, the KMCO2 Operations and SCADA Support groups are implementing rate-of-change alarms for tanks that store liquids. The new alarms will enhance the situational awareness for SCADA controllers who can call out operators during off-hours and mitigate the severity of releases.

Volume of Soil Excavated (cubic yards): 0

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: [X] Corrective Actions Completed (documentation attached)

[ ] Work proceeding under an approved Form 27

Form 27 Remediation Project No:

### OPERATOR COMMENTS:

The purpose of this Form 19 (Supplemental) is to provide the results of laboratory analyses of the soil sample collected in the area surrounding Yellow Jacket YC Cluster Tank T-501 that was impacted by the spill of produced water on 12/26/2020. I have also included a photograph of the impacted area from which the sample was collected. The results of analyses show that no COGCC Table 910-1 screening levels were exceeded. At this time we are requesting that no further action is required for remediation of this release from the Yellow Jacket YC Cluster produced water tank T-501.

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

Signed: \_\_\_\_\_ Print Name: Michael Hannigan

Title: EHS Supervisor Date: 01/20/2021 Email: michael\_hannigan@kindermorgan.com

**COA Type****Description**

|  |   |
|--|---|
|  | Based on review of the information provided, it appears that no further action is necessary at this time and COGCC approves the closure request. Should conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards, or, if groundwater is found to be significantly impacted, further investigation and/or remediation activities may be required at the site.   |
|  | 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." The operator shall provide background concentration levels to demonstrate native exceedances of Table 910-1 along with a formal request for relief from the elevated contaminants of concerns. 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. |

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

|           |                                    |
|-----------|------------------------------------|
| 402579125 | SPILL/RELEASE REPORT(SUPPLEMENTAL) |
| 402579168 | ANALYTICAL RESULTS                 |
| 402579593 | OTHER                              |
| 402580389 | FORM 19 SUBMITTED                  |

Total Attach: 4 Files

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

|               |   |            |
|---------------|---|------------|
| Environmental | "Operator Comments and Submittal" section of this document includes a request for NFA. COGCC SW EPS checked the "Corrective Actions Completed" check box on the "Request for Closure" tab to ensure that this Spill/Release Point ID is closed in the COGIS database. | 01/21/2021 |
|---------------|---|------------|

Total: 1 comment(s)