

SPILL PREVENTION AND CONTAINMENT PLAN

SEELEY OIL COMPANY



August 25, 2021



PREPARED FOR

Seeley Oil Company

P.O. Box 1058

Cortez, CO 81321

(970) 565-2136

PREPARED BY

ECOPPOINT, INC

225 Hutton Ave.

Rifle, CO 81650

208-596-8194

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1. SPCC Plan Facility Information

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been developed for Seeley Oil Company (herein referred to as “The Company”) in accordance with the following rules:

- CFR Title 40, Part 112, Subpart A Applicability, Definitions, and General Requirements for All Facilities and All Types of Oils
- CFR Title 40, Part 112.7 General SPCC Requirements
- CFR Title 40, Part 112, Subpart B, Part 112.9 SPCC Requirements for Onshore Production Facilities (excluding drilling and workover facilities)
- COGCC Rule 912- Spills and Releases

Facility Types: Onshore (oil or) gas production facilities

Facility Name: This SPCC covers all facilities in The Company’s Cortez Area Field. A table of all locations in the Cortez Area Field can be found in Table 1- Facility Locations, found on the following page.

Operator Contact Information

Operator Address: P.O Box 1058 Cortez, CO 81321

Operator Telephone: (970) 565 - 2136

Operator Contact Name/Title: Nathaniel Seeley/Vice President

Types of Oil Stored: Crude Oil/Condensate



Table 1 - Facility Locations

Name	Type	Oil Storage?	COGCC Location ID	County	Township	Range	Section	Quarter-Quarter	Latitude	Longitude
Cutthroat B	Well and Facility	Yes	313548	Montezuma	37N	19W	26	SWNE	37.436686	108.910681
Island Butte A	Well and Facility	Yes	322115	Dolores	38N	19W	7	SWNW	37.566794	108.993015
Island Butte B	Well and Facility	Yes	N/A	Montezuma	38N	19W	21	NENW	37.5418782	108.9483764
SE Spargo	Well and Facility	Yes	322118	Dolores	38N	20W	1	SESE	37.577983	108.997365
Spargo 1-36	Well and Facility	Yes	322109	Dolores	39N	20W	36	SESW	37.593063	109.007306
Cutthroat A	Well and Facility	Yes	313527	Montezuma	37N	19W	10	SWSE	37.471226	108.929262
Island Butte 3	Well	No	322116	Dolores	38N	19W	7	SESW	37.560624	108.987765
Canyon 1	Well	No	322117	Dolores	38N	20W	23	SENE	37.540704	109.016105
Cutthroat 12	Well	No	313578	Montezuma	37N	19W	35	SWNE	37.42406	108.912433
Cutthroat 14	Well	No	313581	Montezuma	37N	19W	35	SESW	37.416466	108.913784
Cutthroat 3	Well	No	313536	Montezuma	37N	19W	23	SESW	37.443756	108.914932
Cutthroat 4	Well	No	313539	Montezuma	37N	19W	10	SENW	37.478846	108.931942
Cutthroat 8	Well	No	313553	Montezuma	37N	19W	26	SWSE	37.429939	108.91092
Cutthroat 9	Well	No	313563	Montezuma	37N	19W	3	SENW	37.495475	108.932143
Island Butte 1	Well	No	381605	Dolores	38N	20W	13	NENE	37.557374	108.998475
Island Butte 5	Well	No	313557	Montezuma	38N	19W	20	NENE	37.541434	108.959774
Island Butte 7-AH	Well	No	313561	Montezuma	38N	19W	20	NENE	37.543344	108.962264
Island Butte 8	Well	No	313558	Montezuma	38N	19W	21	NWNE	37.541314	108.946173
McClean 2	Well	No	313455	Montezuma	37N	19W	15	SWNE	37.465446	108.928372
Island Butte 12	Injection Well	No	313571	Montezuma	38N	19W	21	NENW	37.541044	108.951864
Spargo 2	Injection Well	No	322111	Dolores	38N	20W	1	SENW	37.585793	109.007666



2. Oil Pollution Prevention Regulations

2.1. General Applicability 40CFR§112

The Oil Pollution Prevention Regulations establish procedures, methods, equipment, and other requirements to prevent a discharge of oil from non-transportation related facilities into or onto navigable waters of the United States.

2.1.1. Description of Regulated Facilities

The Oil Pollution Prevention regulations, as promulgated in the Code of Federal Regulations Title 40 Part 112 (40CFR§112), require owners or operators to prepare a Spill Prevention Control and Countermeasures (SPCC) Plan for non-transportation-related onshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States and has completely buried oil storage capacity is over 42,000 U.S. gallons, OR the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons.

2.1.2. Regulatory Threshold

The regulatory threshold for SPCC Plan requirements is an aggregate storage of oil (in aboveground storage containers greater than 55 gallons) of 1,320 gallons or more.

2.1.3. Significant and Substantial Harm

Any facility that could, because of its location, be expected to cause significant and substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines is required to prepare and submit a Facility Response Plan (FRP) to the USEPA Regional Administrator (RA) in accordance with 40CFR§112.20. Note if your facilities do not meet this requirement and thus an FRP is not required.

2.2. Definitions 40CFR§112.2

Definitions included in the SPCC regulations and used in this SPCC Plan are included as Appendix A.

2.3. Requirements to Prepare and Implement the Spill Control and Countermeasures Plan (SPCC) Plan 40CFR§112.3

The Company's Cortez Area Field Wide SPCC Plan was prepared in writing; facility specific data is stored and managed with an electronic database. It has been prepared in accordance with 40CFR§112.7 (General SPCC Requirements and §112.9 SPCC Requirements for Onshore Production Facilities). The purpose of the plan is to identify sources of oil and outline procedures to prevent the release of oil into navigable waters of the United States. This plan identifies equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

2.3.1. Requirements 40CFR§112.3(a and b)

This plan will be maintained in accordance with regulatory requirements, and will be amended if required, to ensure compliance with this part by November 10, 2011 or within six months after operations begin if operations began after November 10, 2011.

2.3.2. Onshore, Offshore Mobile Facilities 40CFR§112.3(c)

Not applicable.

2.3.3. Professional Engineer Certification 40CFR§112.3(d)

I attest that I have; reviewed this plan in accordance with requirements set forth in 40CFR112; am familiar with the requirements of this part; that either I or my agent have visited the facility; the plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with established procedures requiring inspections; that procedures for required inspections and testing have been established; and, that the plan is adequate for the facility.

Printed Name: _____

State: Colorado

Title: _____

Date: _____

Signature: _____

Initial Certification Date: _____

Professional Engineer Registration Number: _____

Expiration Date: _____

2.3.4. Location of Plan 40CFR§112.3(e)(1)(2)

The onshore gas production facilities covered by this plan are unmanned except during inspections, maintenance or loading/unloading; therefore, a copy of the plan will be maintained at the Company's office in Cortez, Colorado. A copy will be available to the Environmental Protection Agency (EPA) Regional Administrator for on-site review during normal workings hours.

Note- a copy must be maintained at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended.

2.3.5. Extensions of Time 40CFR§112.3(f)

Not applicable. Operator has not requested an extension for complying with the requirements of the SPCC regulations.

2.4. Amendment of Plan by Regional Administrator 40CFR§112.4

2.4.1. Reporting 40CFR§112.4(a)(b)(c)

If any of the facilities located within the Cortez Area Field has a discharge of 1,000, US gallons or more of oil in a single discharge or discharges more than 42 US gallons in each of two incidents within any twelve-month period the following information shall be submitted to EPA and appropriate state agency within 60 days.

1. Name of facility,
2. Name of person reporting,
3. Location of facility,
4. Maximum storage or handling capacity of the facility and normal daily throughput,
5. Corrective action and countermeasures,



6. Facility description (maps, flow diagrams, and topographical maps),
7. Cause of discharge (including failure analysis of the system or subsystem in which the failure occurred),
8. Additional preventative measures you have taken or contemplated to minimize the possibility of reoccurrence, and
9. Such other information as required by Regional Administrator (RA).

2.4.2. Amendment of the Plan by Regional Administrator 40CFR§112.4(d)

The Regional Administrator may require amendment of the Plan if the plan does not meet the requirements of this part or if it is necessary to prevent and contain discharges from the facility.

2.5. Amendment of the SPCC Plan by Owner/Operator §112.5

2.5.1. Owner/Operator Requirements to Amend SPCC §112.5(a)(b)(c)

The plan will be amended in accordance with the general SPCC requirements of 40CFR§112.7 (discussed in Section 3.0 of this Plan) and specific SPCC requirements for Onshore Oil Production facilities outlined in 40CFR§112.9 (Section 4.0) when there is a: change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in 40CFR§112.1(b). An amendment will be prepared within six months and implemented as soon as possible but no later than six months following preparation of the amendment. Technical amendments will be certified by a Professional Engineer. Amendments to the plan will be recorded in Appendix B- Amendment Log.

Examples of changes that require amendments include but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility.

2.5.2. Five Year Review Requirement by Owner/Operator 40CFR§112.5(b)

This plan will be reviewed and evaluated at least once every five years from the date the SPCC plan was developed and certified. The plan will be amended within six months following the review and evaluation to include more effective prevention and control technology (if the technology has been field proven at the time of the review and will significantly reduce the likelihood of a discharge from the facility). Amendments to the plan will be Implemented as soon as possible, but no later than six months following preparation of any amendment.

The review will be documented, and the following statement will be made at the beginning of the plan, so the latest revision is easy to discern. "I have completed review and evaluation of the SPCC Plan for [name of facility] on [date] and will [will not] amend the Plan as a result."

2.5.3. PE Certification of Technical Amendments of the SPCC Plan 40CFR§112.5(c)

Technical amendments identified or developed during the five-year review and evaluation are to be certified by a Professional Engineer in accordance with 40CFR§112.3(d).

3. General SPCC Plan Requirements §112.7

3.1. Management Approval

This multi-facility SPCC Plan was prepared in accordance with good engineering practices and has full approval of management at a level of authority to commit the necessary resources to fully implement the plan. This SPCC Plan was prepared in writing and electronically using an electronic database to manage facility specific data. It follows the sequence of 40CFR§112 and, therefore, no cross-reference is required or included.

This SPCC plan has been created for The Company's Cortez Area Field, I have reviewed this plan and approve of its contents. The plan will be implemented in accordance with 40CFR §112.

Printed Name:

Title:

Signature:

Date:

3.2. Plan Information

3.2.1. Plan Conformance 40CFR§112.7(a)(1)

This SPCC plan was prepared in accordance with all applicable requirements established in 40CFR§112 for non-transportation, onshore oil production facilities.

3.2.2. Plan Deviations 40CFR§112.7(a)(2)

This plan complies applicable requirements of 40CFR§112.7 and 40CFR§112.9.

3.2.3. Facility Location and Description 40CFR§112.7(a)(3)

This multi-facility SPCC Plan was developed for The Company's Cortez Area Field located in Montezuma and Dolores counties in southwest Colorado. The location of facilities included in the Cortez Area Field are shown in Table 1 and on Appendix C- Field Location Map.

3.2.3.1. Facility Oil Storage Capacity 40CFR§112.7(a)(3)(i)

A list of oil storage containers, container capacity, construction material and type of oil stored in each container is included in facility diagrams attached in Appendix D-Facility Diagrams. The Company has also provided an estimate of the potential number of mobile (portable) containers, the types of oil, and anticipated storage capacities.

3.2.3.2. Discharge Prevention Measures and Routine Handling of Products §112.7(a)(3)(ii)

Discharge prevention is provided through several methods including, routine inspections, and systematic maintenance and repair, and through strict adherence to company material handling procedures.

Facility equipment is routinely inspected, and maintenance and repairs conducted as soon as practicable to correct a problem that may cause a release. Equipment inspection and maintenance forms are contained in Appendix F- Facility and Equipment Inspection and Maintenance.

Product unloading/Loading procedures are strictly controlled. The Company requires truck drivers to use the following procedures:

1. Pull truck onto the location
2. Inspect the location
3. Note unusual situations and report the issue to the dispatcher
4. Wear appropriate personal protective equipment: fire retardant clothing, hardhat, safety glasses and steel-toed shoes
5. Plan an escape route, park facing the exit
6. When possible park as close to the stairs as possible
7. Observe the area for additional leaks, spills, releases, equipment damage, etc.
8. Gauge the tank.
9. Watch your footing and utilize the handrail
10. Attach the bondstrap to as close to the unloading operation as possible
11. Connect the hose to the tank and the truck
12. Break the seal on the tank valve and record the seal number on the field ticket
13. Place the truck pump in the vacuum position
14. Open the valve on the truck first
15. Open the valve on the tank next
16. Ensure that the vacuum on the truck is operating properly
17. Open valve on the truck slowly
18. Remove material from the tank

Product that is transferred from the storage tanks into tank trucks is removed from each facility by a contractor. The transfer operations are supervised by the truck driver to mitigate and/or minimize the potential for release. All transfer equipment is routinely inspected and maintained to ensure proper operation.

3.2.3.3. Discharge or Drainage Controls 40CFR§112.7(a)(3)(iii)

Discharge control for the Company facilities is provided by secondary containment for oil, produced water and condensate tanks. Still vent drip tanks and the use of drip buckets at tank truck loading and unloading areas are also discharge control measures used.

*3.2.3.4. Countermeasures for Discharge Discovery, Response, and Clean Up
§112.7(a)(3)(iv)*

Discharges at these facilities will be discovered through routine site inspections and through routine maintenance and operational activities. Upon discovery of a release, immediate action should be taken to stop the spill. The following eight (8) steps should be initiated if it is safe to do so.

1. Protect Yourself (PPE)
2. Eliminate ignition sources.
3. Restrict Access
4. Stop the source of the release if safely possible using available resources (including spill kits).
5. Assess the basic situation.
6. If the incident poses an immediate threat of Fire, Explosion, or other impact to safety, health, or the environment, contact the local fire department at 911.
7. Conduct Internal and External Notifications
8. Contain the spill.

Additional Oil Spill Response Procedures are included as Appendix G- Oil Spill Response Procedures. The Company will contain the spill or release to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. After the situation is under-control and the flow has stopped submit a report to the supervisor using an internal form. The form includes documentation of the cleanup and cleanup efforts.

Accumulated oil and oil contaminated soil from field ditches, road ditches, and from within the secondary containment berms will be cleaned up as required by SPCC regulation {(FR67NO37 July 17, 2002 – 112.9(b)(2)}. Contact the EH&S department for additional guidance. If additional manpower or contractors are needed for cleanup refer to Table 2 . Any clean-up measures are to be conducted in accordance with all local, state, and federal requirements, or as directed by the responsible agency.

Company will document and maintain records to demonstrate compliance with the concentration levels in COGCC Rule 900- Table 915-1 (Appendix H), and, if surface water or Groundwater are impacted, WQCC Regulation 41 numeric and narrative Groundwater quality standards and classifications, as incorporated by reference in Rule 901.b.

3.2.3.5. Disposal of Recovered Materials 40CFR§112.7(a)(3)(v)

Contaminated material that is recovered during clean-up efforts will be disposed of in accordance with all applicable regulations. The EH&S Department will assist with disposal as needed. Recovered product is to be placed back into the proper container. Produced water can be placed back into produced water container or transported offsite for disposal. Materials recovered during a spill event will be appropriately containerized or will be remediated onsite in accordance with Bureau of Land Management (BLM) and Colorado Oil and Gas Conservation Commission (COGCC) stipulations. Soils and other solids will be placed in 55-gallon drums or roll-off containers or other approved containers. Recovered materials will be labeled, characterized, and disposed of in accordance with all applicable regulations or as directed by the responsible agency.

3.2.3.6. Contacts 40CFR§112.7(a)(3)(vi)

Table 2 lists contacts that will need to be contacted in case of a spill/release.

Table 2: Spill/Release Contacts

Facility Response Coordinator	Nathaniel Seeley, Vice President
National Response Center	1-800-424-8802
Colorado Department of Public Health and Environment (CDPHE) Environmental Release/ Incident Report Hotline	1-877-518-5608
Colorado Oil and Gas Conservation Commission (COGCC) Director	(303) 894-2100
Colorado Parks and Wildlife (CPW) if spill/release occurred within 300 feet of surface Waters of the State or within High Priority Habitat	(970) 247-0855
Colorado State Patrol	(303) 239-4501
US EPA Region 8 Emergency Response Spill Report Line	(303) 293-1788
Montezuma County	
Emergency Manager	Montezuma County Office of Emergency Management: (970) 564-4137 (Jim Spratlen, Emergency Manger)
Sherriff	Montezuma County Sheriff's Office: (970) 565 - 8452
Fire Protection	Pleasant View Fire Department (Chief, Angela Rohwer): (970) 739 – 6060
Dolores County	
Emergency Manager	Dolores County Office of Emergency Management: (970) 564-4137 (Keith Keesling, Emergency Manager)
Sheriff	Dolores County Sheriff: (970) 677-2257
Fire Protection	Dove Creek Fire Department: (970) 529-6679 (Fire Chief Jake Kline)
Company	
Company Executive & Response Coordinator	Nathaniel Seeley, (970) 560-2780
Manager of Field Operations	Todd Henderson, (970) 749-0512
Contractors	
R & B Oilfield Service	(970) 749-0442
Thirsty Bird Energy Services	(970) 314-5777
T & M Dirtworks	(970) 533-7825

3.2.4. Information for Reporting a Discharge 40 CFR§ 112.7(a)(4)

3.2.4.1. *Information to be provided about Spill or Release Notification*

The following information will be available:

- 1) Exact address or location and phone number of the facility.
- 2) Exact latitude and longitude of the Spill or Release.
- 3) The date and time of the discharge.
- 4) The type of material discharged.
- 5) Estimates of the total quantity discharged.
- 6) Estimates of the quantity discharged.
- 7) The source of the discharge.
- 8) A description of all affected media.
- 9) The cause of the discharge.
- 10) Any damages or injuries caused by the discharge.
- 11) Actions being used to stop, remove, and mitigate the effects of the discharge.
- 12) Whether an evacuation may be needed.
- 13) The names of individuals and/or organizations who have also been contacted.

3.2.4.2. *Internal Reporting Requirements*

Spills/releases greater than 1 barrel of a produced liquid (condensate, produced water and or condensate drip) or a spill/release of greater than 25 gallons of any refined hydrocarbon product will be reported to the EH&S Department. A written report will be submitted via e-mail or by fax. This report should be completed as soon as practical after a spill event and submitted electronically to the EH&S Department. An initial report template is included in Appendix E-Initial Hazardous Materials Spill Report.

3.2.4.3. *External Reporting Requirements*

A spill or discharge of a harmful quantity of oil will be reported to the National Response Center immediately (see contact table for telephone number). A harmful quantity of oil is defined as: a discharge into or upon navigable waters of the United States, that impacts surface water quality by causing a sheen, film or discoloration of the water surface or adjoining shorelines or causes a sludge or emulsion to be deposited beneath the surface or adjoining shoreline. Information regarding the spill notification is in Section 3.2.4.1 and contacts in 3.2.3.6.

3.2.4.3.1. Notification to COGCC within 24 Hours

Spills/releases of E&P Waste, natural gas, or produced Fluids will be reported to COGCC Director via an initial report (24 Hour Notification) verbally, via electronic mail, or on a Form 19 Spill/Release Report-Initial within 24 hours of discovery that meet any of the following criteria. If the Operator did not submit the 24-hour notification via a Form 19, then they have 72 hours to submit a Form 19 to COGCC Director. (These criteria below were taken from COGCC Rule 912(b)(1)(A)-(J).

- A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly maintained road.
- A Spill or Release in which 1 Barrel or more of E&P Waste or produced Fluids is spilled or released outside of berms or other secondary containment.

- A Spill or Release of 5 Barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.
- Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak.
- The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.
- The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable.
- A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a Spill or Release of any volume that daylights from the subsurface.
- A Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property.
- A Release of natural gas that results in an accumulation of soil gas or gas seeps.
- A Release that results in natural gas in Groundwater.

3.2.4.4. Information Needed for the 24-Hour Notification to COGCC Director (Rule 912.b.(2))

The 24-Hour Notification to the COGCC Director will include, at a minimum,

- 1) The specific location of the Spill or Release, including latitude and longitude.
- 2) Certification that the Operator provided additional party notifications as required by Rules 912.b.(7)–(10), below;
 - a) Notification to Local Governments. At the same time the Operator makes the 24-Hour Notification, the Operator will provide verbal or written notification to the entity with jurisdiction over emergency response within the local municipality if the Spill or Release occurred within a municipality or the local county if the Spill or Release did not occur within a municipality. The notification will include, at a minimum, the information listed in Rule 912.b.(2).
 - b) Notification to the Surface Owner. The Operator will provide verbal or written notification to the affected Surface Owner or the Surface Owner’s appointed tenant concurrent with providing the 24-Hour Notification.
 - i) If the Surface Owner cannot be reached within 24 hours, the Operator will continue to make good faith efforts to notify the Surface Owner until notice has been provided.



- ii) The verbal or written notification will include, at a minimum, the information listed in Rule 912.b.(2).
 - iii) The Operator will document the notification including the name of the person contacted, phone number or email of contact, date, and time on the Form 19 – Initial and update the information as necessary on the Form 19 -- Supplemental.
- c) Report to Environmental Release/Incident Report Hotline

Operators will report a Spill or Release of any size that impacts or threatens to impact surface waters to the Director and to the Environmental Release/Incident Report Hotline (1-877-518-5608). Spills and Releases that impact or threaten a Public Water System intake, as described in Rules 411.a.(4) & 411.b.(5), will be verbally reported to the emergency contact for that facility concurrent with providing the 24-Hour Notification to the Director pursuant to Rule 912.b.(1).

d) Notification to CPW

At the same time the Operator submits a Form 19 – Initial, the Operator will provide verbal or written notification to CPW if the Spill or Release occurred within 300 feet of surface Waters of the State, or within High Priority Habitat.

- i) A description of any threat to Waters of the State, Public Water Systems, residences or occupied structures, livestock, wildlife, air quality, or publicly maintained roads from the Spill or Release; and
- ii) Any information available to the Operator about the type and volume of Fluid or waste involved, including whether it is controlled or uncontrolled at the time of the 24-Hour Notification.

3.2.4.5. COGCC Form 19- Supplemental

The Company will submit a Form 19- Supplemental to the COGCC Director not more than 10 days after the Spill or Release discovery that includes (taken from Rule 912.b.(4)):

- A topographic map showing the governmental section and location of the Spill or Release, or an aerial photograph showing the location of the specific Spill or Release site.
- All pertinent information about the Spill or Release known to the Operator that has not been reported previously, including photo documentation showing the source of the Spill or Release, the impacted area, and initial cleanup activity; and
- Information relating to the initial mitigation, site investigation, and Remediation measures conducted by the Operator.
- Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2). did not meet the requirements of Rule 216.

3.2.4.6. Suspected Spill or Release Closure

The Company will submit a Supplemental Form 19 to the COGCC Director providing documentation that any suspected Spill/Release did not exceed any applicable reporting thresholds. The COGCC defines suspected release as: “A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a Spill or Release of any volume that daylights from the subsurface.” (Rule 912.b.(1).G). All spills will be cleaned up and documented.

3.2.5. Guidelines for Spill Response 40CFR §112.7(a)(5)

Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

The Company spill response plan can be found in Appendix G-Oil Spill Response Procedures

3.3. Potential Spill Sources and Discharge Drainage Analysis §112.7(b)

A summary of equipment at each facility included in this plan that has a reasonable the potential for failure is provided in Appendix H- Table of Equipment at each Facility that has a reasonable potential for failure. This table includes prediction of the discharge flow direction, rate of flow estimate, and total quantity of oil which could be discharged from the facility because of each type of major equipment failure.

3.4. Secondary Containment 40CFR§112.7(c)

Secondary containment requirements for oil storage containers for onshore production facilities are discussed in Section 3.3 Oil Production Facility Bulk Storage Containers.

The Company primarily uses earthen berms for all secondary containment purposes at tank batteries and around equipment with significant capacity. Other collection systems such as flare pits and blow down tanks are used as well, and these areas are contained with earthen berms. Containment volumes of bermed areas has been calculated and compared to the storage capacity on each battery to determine effectiveness. These calculations can be found on the facility diagrams in Appendix D.

3.5. Contingency Plan 40CFR§112.7(d)

Operator Plan is certified by a PE. All structures or pieces of equipment listed in this document comply with secondary containment and other measures to prevent a discharge. Bulk storage containers have both period integrity testing of the containers and periodic integrity and leak testing of the valves and piping.

3.6. Inspections, Tests, and Records 40CFR§112.7(e)

This Oil Spill Contingency Plan (Plan) was prepared in accordance with 40 CFR 112.7(a)(5) to address discharges of oil from the facilities covered by the SPCC Plan. It also addresses oil discharges from field operations where secondary containment is impracticable, per 40 CFR 112.7(d). This Plan complements the prevention and control measures presented in the SPCC Plan by defining procedures and tactics for reporting and responding to discharges of oil.

The Plan is intended to protect the public and minimize damage to the environment by providing a timely, efficient, coordinated, and effective action plan to respond to oil discharges. The plan is consistent with the National Oil and Hazardous Materials Pollution Contingency Plan and follows the guidelines provided in 40 CFR 109.

40 CFR 109.5 (a) Definition of the authorities, responsibilities, and duties of all persons

Seeley Oil Company Management is responsible for:

- Ensuring the necessary resources for control and clean up are available.
- Ensuring that personnel are adequately trained to notice, report, and respond to oil discharges.
- Committing the necessary resources (including monetary)
- Ensuring that proper notifications are made to Federal, State and Local agencies, including any follow up documentation.

Seeley Oil Company Lead Operator (or designated), serving as the Incident Commander, is responsible for:

- Overall coordination of the control and clean-up of the oil discharge
- Requesting additional assistance from outside contractors and/or the Federal authorities if necessary
- Ensuring repairs are made prior to putting equipment back in service.
- Providing site safety plan if necessary
- Coordinating disposal of contaminated material
- Being familiar with the SPCC and Oil Spill Contingency Plans
- Being alert for oil discharges and responding to them as appropriate
- Assisting, as required, in the control and cleanup of the oil discharge.

40 CFR 109.5(b) Establishment of notification procedures

Seeley Oil Company owns and operates several oil production facilities located in the Montezuma and Dolores Counties, Colorado. Personnel are trained to look for and report any oil discharge. The following is a list of emergency contact numbers. Depending on the size and nature of the oil discharge some or all these contacts will be notified. During an emergency, the Seeley Oil Company Emergency Response Plan should be referred to for further instruction.

Name	Title	Cell	Home
Nate Seeley	Owner/Manager	(970) 560-2780	(970) 565-7138
Todd Henderson	Lead Operator/Incident Commander	(970) 749-0512	(970) 565-8226
Mike Shultz	Site Safety Officer	(970) 560-5225	(970) 677-2499

40 CFR 109.5(c) Provisions to assure that full resource capability is known.

The tank batteries generally consist of one or more 400 barrel above ground condensate storage tanks, production water storage tanks, oil storage tanks and production equipment. Each tank battery has secondary containment per the SPCC plan.

Multiple well heads at each pad are tied to tank batteries by flowlines. The flowlines are typically short. Isolation valves are periodically located along the lines. Most flowlines and consolidation lines are below



ground and lack secondary containment. The company maintains an inspection and maintenance program to notice and prevent leaks from lines.

All field operation personnel are familiar with the location of spill response equipment and response strategies, and with the SPCC and Oil Spill Contingency Plans.

Sufficient equipment to respond to most oil discharges is kept at facility storage areas and is accessible 24-hours a day to field operation personnel. This equipment is verified on a quarterly basis by designated personnel and is replenished as needed.

Facility equipment will be visually inspected on a routine basis by the Field Technician/Pumper responsible for the location. Records of these inspections will be maintained on the Field Technician's Log found in Appendix F- Facility and Equipment Inspection and Maintenance. If an issue is detected during their routine visit, it will be noted in the log and reported to the Supervisor to allow scheduling of maintenance/repair.

The facility oil storage containers and secondary containment berms will be inspected annually by the Field Technician/Pumper, and the inspection recorded on the Annual Storage Tank Inspection Form in Appendix F- Facility and Equipment Inspection and Maintenance

Inspection and drainage records will be maintained with the SPCC plan and will be kept for 3 years.

40 CFR 109.5(d) Provisions for well-defined and specific action to be taken after discovery and notification of an oil discharge.

Upon the discovery of an oil discharge the Incident Commander will be notified so that appropriate action can be taken. The Incident Commander has the authority to direct and coordinate response operations and may request assistance from Federal authorities, as necessary.

Tank batteries are inspected daily during the work week and flowlines are inspected by visual drive bys. In the event of a discharge, the priority is to stop the product flow and to shut off all ignition sources, followed by the containment, control, and mitigation of the discharge. Specifically, the following response procedures will be implemented:

Response Procedures

- 1) Detection:
 - a) Notify the Incident Commander that an oil spill has occurred (provide location, source, amount, nearby areas of concern, etc.).
 - b) Shut off ignition sources (motors, electrical circuits, open flames).
 - c) Turn off pumping unit that charges or provides flow to the flowlines.
 - d) Locate the source of flowline leak.
 - e) Attempt to stop the source of the leak if it can be done safely.
 - f) Initiate containment.
- 2) Assessment and Notifications:
 - a) Investigate the discharge to assess the actual or potential threat to human health or the environment.
 - b) Mobilize the Emergency Response Team, if necessary.
 - c) Make appropriate notifications to Federal, State, and Local agencies.



- d) Request outside assistance from local emergency responders, as needed.
 - e) Communicate with property owners regarding the discharge and actions taken to mitigate the damage.
- 3) Control and Recovery
- a) Prevent the spread of oil by deploying absorbents (i.e., booms), by building diversion structures (i.e. berms), or digging temporary containment pits.
 - b) Direct clean-up of the oil and oil contaminated material.
 - c) Arrange to have soil and/or water samples analyzed. If contaminants are below the COGCC's allowable concentrations cleanup is complete.
 - d) Containerize contaminated material (soil, water, absorbent material, etc.).
- 4) Disposal of Recovered Product and Contaminated Response Material
- a) Recovered product can either be added to another tank or disposed of at an appropriate disposal site.
 - b) Properly characterize, label, and store all contaminated material.
 - c) Dispose of contaminated material in accordance with all applicable solid and hazardous waste regulations using a licensed waste hauler and disposal facility.
- 5) Termination
- a) Arrange for necessary repairs to equipment or flowlines.
 - b) Review circumstances that led to the discharge and take necessary precautions to prevent a recurrence.
 - c) Submit any required follow-up reports to the authorities.
 - d) Update the SPCC and Oil Spill Contingency Plan as necessary.

40 CFR 109.5(e) Specific and Well-Defined Procedures to Facilitate Recovery of Damages

An Environmental Incident Report will be filled out by the Incident Commander and maintained on file at the company office. Any other documentation regarding the oil discharge will also be kept of file.

3.7. Personnel, Training, and Discharge Prevention Procedures §112.7

3.7.1. Training §112.7(f)(1)

All oil-handling field personnel will receive, at a minimum, annual training applicable to the operation and maintenance of equipment to prevent discharges, discharge procedures, applicable rules and regulations, general facility operations, and the contents of the SPCC Plan. A training outline and training log are provided in Appendix J - Discharge Prevention Training Outline and Training Log.

3.7.2. Discharge Prevention Coordinator §112.7(f)(2)

The Field Technician for each facility reports to facility management and is accountable for discharge prevention. They will make appropriate reports to the production supervisor/EHS department upon discovery of any discharge.

3.7.3. Discharge Prevention Briefing 40CFR§112.7(f)(3)

A meeting/training session to discuss the SPCC Plan, any spills/discharges, malfunctions, failures, and any other pertinent information will be scheduled at least annually and be available to all affected employees. Records of the meeting(s) are available in the safety training records. A copy of the Oil Discharge Prevention Meeting Log is enclosed in Appendix J - Discharge Prevention Training Outline and Training Log.



3.8. Security 40CFR§112.7(g)

Onshore production facilities are excluded from the requirements of this subsection. These facilities are in rural areas and security is generally not a concern. Facility Tank Car Loading/Unloading Rack 40CFR§112.7(h)

The facilities contained in this SPCC Plan do not have facility tank car unloading racks. Secondary containment for tank car loading/unloading areas is discussed in Section 3.4.

3.9. Brittle Fracture Analysis 40CFR§112.7(i)

The facilities in this plan do not utilize field constructed above ground containers and therefore they are not subject to this section of the rule.

3.10. State Requirements 40CFR§112.7(j)

This Plan meets State of Colorado SPCC requirements.

4. Requirements for Onshore Oil Production Related Facilities 40CFR§112.9

4.1. Onshore Oil Production Requirements 40CFR§112.9(a)

This plan meets the general requirements listed under section 40CFR112.7.

4.2. Oil Production Facility Drainage 40CFR§112.9(b)(1)(2)

4.2.1. Drainage from Diked Areas

Secondary containment berms in the Cortez Area Field are not equipped with drainage valves. Accumulated precipitation is generally allowed to evaporate. No permanent automatic pumps or ejector devices are present. If a berm must be drained a vacuum truck is generally utilized. Prior to draining a berm, the accumulated precipitation must be inspected by the Field Technician or the pumper/gauger. If oil is noted on the accumulated precipitation, it will be removed prior to draining the berm. Recovered product is to be placed back into appropriate container. Drainage of a berm event must be recorded on the Berm Drainage Log found in Appendix F- Facility and Equipment Inspection and Maintenance.

4.2.2. Field Drainage Area

The facility Field Technician will inspect the bermed area and all drainage or diversionary structures such as road ditches on a routine basis. Any leaks or discharges will be logged on the Field Technician's form in Appendix F and reported to the Supervisor. Accumulated oil will be removed promptly and returned to appropriate container.

4.3. Onshore Oil Production Facility Bulk Storage Containers §112.9(c)(1)-(6)

Oil storage containers have been designed and installed in accordance with good engineering practices. The construction and tank materials are compatible with the material stored and the conditions of storage. Container capacity is adequate to assure that the tank will not overflow if the pumper is delayed in making regularly scheduled rounds.

Oil storage containers are enclosed within a secondary containment structure. Secondary containment requirements for each facility and the actual berm capacities are included in the facility maps in Appendix D- Facility Diagrams. The secondary containment provides the entire capacity of the largest single container and sufficient freeboard to contain precipitation. The secondary containment berms are constructed of either of earthen materials or metal sheeting to contain oil within the bermed area until cleanup can occur. Earthen berms are composed of packed silty clay material and completed with covered with a gravel to provide protection from erosion.

You must safely confine drainage from undiked areas in a catchment basin or holding pond. Storage tanks are inspected annually for deterioration and maintenance needs.

New and old tank battery installations will be updated or installed in accordance with good engineering practices to prevent discharges. Tank batteries, facilities, and associated equipment in this plan feature the following:

- a) Container capacity adequate to assure that a container will not overflow if a pumper/gauger is delayed in making regularly scheduled rounds.

- b) Overflow equalizing lines are between containers so that a full container can overflow to an adjacent container.
- c) Vacuum protection adequate to prevent container collapse during a pipeline run or other transfer of oil from the container.
- d) High level sensors to generate and transmit an alarm signal to the computer where the facility is subject to a computer production control system.
- e) Flow-through process vessels.
 - Flow through process vessels and associated components are visually inspected and/or tested regularly for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) in accordance with good engineering practice.
 - Corrective action or repairs are immediately made to the Flow through process vessels and associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge.
 - Promptly remove or initiate actions to stabilize and remediate any accumulations of oil discharges associated with the flow through process vessel are promptly removed, stabilized, and remediated.
 - If a facility discharges more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or discharges more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period from a produced water container subject to this subpart (excluding discharges that are the result of natural disasters, acts of war, or terrorism) then you must, within six months from the time the facility becomes subject to this paragraph, ensure that all produced water containers subject to this subpart comply with §112.9(c)(2) and (c)(3).
- f) Produced water containers
 - Produced water containers and associated piping are visually inspected and/or tested regularly for leaks, corrosion, or other conditions that could lead to a discharge as described in §112.1(b) in accordance with good engineering practice.
 - Corrective action or repairs are immediately made to the produced water container and any associated piping as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge.
 - Promptly remove or initiate actions to stabilize and remediate any accumulations of oil discharges associated with the produced water container are promptly removed, stabilized, and remediated.
 - If a facility discharges more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or discharges more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period from a produced water container subject to this subpart (excluding discharges that are the result of natural disasters, acts of war, or terrorism) then you must, within six months from the time the facility becomes subject to this paragraph, ensure that all produced water containers subject to this subpart comply with §112.9(c)(2) and (c)(3).

4.4. Facility Transfer Operations 40CFR§112.9 (d)

i) Facility Transfer Operations 40CFR§112.9 (d)(1)

Facility transfer operations employ equipment that automatically transfers water, oil, condensate drip or other products from wellhead to process equipment and then to storage containers. This process primarily utilizes buried piping and automatic pumps. The use of this type of equipment and the design of the facilities eliminates transferring product using handheld pumps or pouring by hand thereby reducing potential for spills or releases. New and updated facilities within the Cortez Area Field will be engineered and constructed in this manner.

The Field Technician and area pumper inspects on regularly scheduled rounds, aboveground valves and piping associated with transfer operations for general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder, and gauge valves, etc. Buried equipment and piping is visually inspected for corrosion whenever exposed through excavation. Problems with transfer areas or equipment in general on the Field Technician's Log in Appendix F and report to the Supervisor. When a pipe is not in service, for an extended period, the associated valves are to be kept closed and lines are bull plugged or blind flanged and marked as to the tie-in connection.

ii) Flow line Maintenance 40CFR§112.9(d)(3)

Flowlines and piping at production facilities can be sources of releases. The quantity and rates of such events will vary according to failure mode, operating pressures, current production rates, and duration of the release.

Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume and pressure, and other conditions expected in the operational environment.

Most of the piping in the field is constructed of steel. Flowlines are powder coated and/or painted. Flowline construction materials are corrosion resistant to condensate, crude oil, and produced water. Flowlines are sized appropriately for the flow volumes expected at the facility.

Aboveground flowlines and associated equipment are visually inspected daily during the field technician/pumper's regularly scheduled site visits for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in 40 CFR 112.1(b). Inspection of conditions associated with buried flowlines is accomplished by observing the ground surface above the lines for evidence of leaks on an annual basis and written into the Annual SPCC Inspection Form in Appendix F. Records of the annual inspections are stored at the Cortez Field Office. Buried flowlines are also inspected whenever they are exposed.

Appropriate corrective actions or repairs are made to any flowline, intra-facility gathering line, or associated equipment if evidence of a discharge is present. Evidence of a discharge includes product that has surfaced above the flowline. Suspected releases, including significant loss of pressure in the line or significant reduction in product recovered in the production tanks will be investigated.

In the event a leak is discovered, the lines will be replaced with pipe constructed of appropriate materials. All repaired or replaced flowlines are pressure tested prior to being put into operation.

Actions are initiated promptly to stabilize and remediate any accumulations of oil discharges associated with flowlines, intra-facility gathering lines, and associated appurtenances.

Releases are reported to the appropriate supervisor and cleanup personnel upon discovery. Oil and impacted media are removed or remediated as soon as practicable.



Appendix A – Definitions

The following definitions were directly taken from CFR Title 40, Part 112, Subpart A, 112.2 Definitions

For the purposes of this part:

Adverse weather means weather conditions that make it difficult for response equipment and personnel to clean up or remove spilled oil, and that must be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include ice conditions, temperatures, weather-related visibility, and currents within the area in which the systems or equipment is intended to function.

Alteration means any work on a container involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of the container.

Animal fat means a non-petroleum oil, fat, or grease of animal, fish, or marine mammal origin.

Breakout tank means a container used to relieve surges in an oil pipeline system or to receive and store oil transported by a pipeline for reinjection and continued transportation by pipeline.

Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

Bunkered tank means a container constructed or placed in the ground by cutting the earth and re-covering the container in a manner that breaks the surrounding natural grade, or that lies above grade, and is covered with earth, sand, gravel, asphalt, or other material. A bunkered tank is considered an aboveground storage container for purposes of this part.

Completely buried tank means any container completely below grade and covered with earth, sand, gravel, asphalt, or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered aboveground storage containers for purposes of this part.

Complex means a facility possessing a combination of transportation-related and non-transportation-related components that is subject to the jurisdiction of more than one Federal agency under section 311(j) of the CWA.

Contiguous zone means the zone established by the United States under Article 24 of the Convention of the Territorial Sea and Contiguous Zone, that is contiguous to the territorial sea and that extends nine miles seaward from the outer limit of the territorial area.

Contract or other approved means:

(1) A written contractual agreement with an oil spill removal organization that identifies and ensures the availability of the necessary personnel and equipment within appropriate response times; and/or

(2) A written certification by the owner or operator that the necessary personnel and equipment resources, owned or operated by the facility owner or operator, are available to respond to a discharge within appropriate response times; and/or

(3) Active membership in a local or regional oil spill removal organization that has identified and ensures adequate access through such membership to necessary personnel and equipment to respond to a discharge within appropriate response times in the specified geographic area; and/or

(4) Any other specific arrangement approved by the Regional Administrator upon request of the owner or operator.

Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil, but excludes discharges in compliance with a permit under section 402 of the CWA; discharges resulting from circumstances identified, reviewed, and made a part of the public record with respect to a permit issued or modified under section 402 of the CWA, and subject to a condition in such permit; or continuous or anticipated intermittent discharges from a point source, identified in a permit or permit application under section 402 of the CWA, that are caused by events occurring within the scope of relevant operating or treatment systems. For purposes of this part, the term discharge shall not include any discharge of oil that is authorized by a permit issued under section 13 of the River and Harbor Act of 1899 (33 U.S.C. 407).

Facility means any mobile or fixed, onshore, or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used, as described in appendix A to this part. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and types of activity at the site. Contiguous or non-contiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.

Farm means a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, \$1,000 or more of agricultural products during a year.

Fish and wildlife and sensitive environments mean areas that may be identified by their legal designation or by evaluations of Area Committees (for planning) or members of the Federal On-Scene Coordinator's spill response structure (during responses). These areas may include wetlands, National and State parks, critical habitats for endangered or threatened species, wilderness and natural resource areas, marine sanctuaries and estuarine reserves, conservation areas, preserves, wildlife areas, wildlife refuges, wild and scenic rivers, recreational areas, national forests, Federal and State lands that are research national areas, heritage program areas, land trust areas, and historical and archaeological sites and parks. These areas may also include unique habitats such as aquaculture sites and agricultural surface water intakes, bird nesting areas, critical biological resource areas, designated migratory routes, and designated seasonal habitats.

Injury means a measurable adverse change, either long- or short-term, in the chemical or physical quality or the viability of a natural resource resulting either directly or indirectly from exposure to a discharge, or exposure to a product of reactions resulting from a discharge.

Loading/unloading rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.

Maximum extent practicable means within the limitations used to determine oil spill planning resources and response times for on-water recovery, shoreline protection, and cleanup for worst case discharges from onshore non-transportation-related facilities in adverse weather. It includes the planned capability to respond to a worst-case discharge in adverse weather, as contained in a response plan that meets the requirements in §112.20 or in a specific plan approved by the Regional Administrator.

Mobile refueler means a bulk storage container onboard a vehicle or towed, that is designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive, vessel, ground service equipment, or other oil storage container.

Motive power container means any onboard bulk storage container used primarily to power the movement of a motor vehicle, or ancillary onboard oil-filled operational equipment. An onboard bulk storage container which is used to store or transfer oil for further distribution is not a motive power container. The definition of motive power container does not include oil drilling or workover equipment, including rigs.

Navigable waters mean waters of the United States, including the territorial seas, as defined in §120.2 of this chapter.

Non-petroleum oil means oil of any kind that is not petroleum-based, including but not limited to: Fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.

Offshore facility means any facility of any kind (other than a vessel or public vessel) located in, on, or under any of the navigable waters of the United States, and any facility of any kind that is subject to the jurisdiction of the United States and is in, on, or under any other waters.

Oil means oil of any kind or in any form, including, but not limited to fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Oil-filled operational equipment means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors, and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

Oil Spill Removal Organization means an entity that provides oil spill response resources, and includes any for-profit or not-for-profit contractor, cooperative, or in-house response resources that have been established in a geographic area to provide required response resources.

Onshore facility means any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

Owner or operator means any person owning or operating an onshore facility or an offshore facility, and in the case of any abandoned offshore facility, the person who owned or operated or maintained the facility immediately prior to such abandonment.

Partially buried tank means a storage container that is partially inserted or constructed in the ground, but not entirely below grade, and not completely covered with earth, sand, gravel, asphalt, or other material. A partially buried tank is considered an aboveground storage container for purposes of this part.

Permanently closed means any container or facility for which:

(1) All liquid and sludge have been removed from each container and connecting line; and

(2) All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

Person includes an individual, firm, corporation, association, or partnership.

Petroleum oil means petroleum in any form, including but not limited to crude oil, fuel oil, mineral oil, sludge, oil refuse, and refined products.

Produced water container means a storage container at an oil production facility used to store the produced water after initial oil/water separation, and prior to reinjection, beneficial reuse, discharge, or transfer for disposal.

Production facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.

Regional Administrator means the Regional Administrator of the Environmental Protection Agency, in and for the Region in which the facility is located.

Repair means any work necessary to maintain or restore a container to a condition suitable for safe operation, other than that necessary for ordinary, day-to-day maintenance to maintain the functional integrity of the container and that does not weaken the container.

Spill Prevention, Control, and Countermeasure Plan; SPCC Plan, or Plan means the document required by §112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

Storage capacity of a container means the shell capacity of the container.

Transportation-related and non-transportation-related, as applied to an onshore or offshore facility, are defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency, dated November 24, 1971, (appendix A of this part).

United States means the States, the District of Columbia, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, Guam, American Samoa, the U.S. Virgin Islands, and the Pacific Island Governments.

Vegetable oil means a non-petroleum oil or fat of vegetable origin, including but not limited to oils and fats derived from plant seeds, nuts, fruits, and kernels.

Vessel means every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water, other than a public vessel.

[67 FR 47140, July 17, 2002, as amended at 71 FR 77290, Dec. 26, 2006; 73 FR 71943, Nov. 26, 2008; 73 FR 74300, Dec. 5, 2008; 80 FR 37108, June 29, 2015; 83 FR 5208, Feb. 6, 2018; 84 FR 56668, Oct. 22, 2019; 85 FR 22339, Apr. 21, 2020]

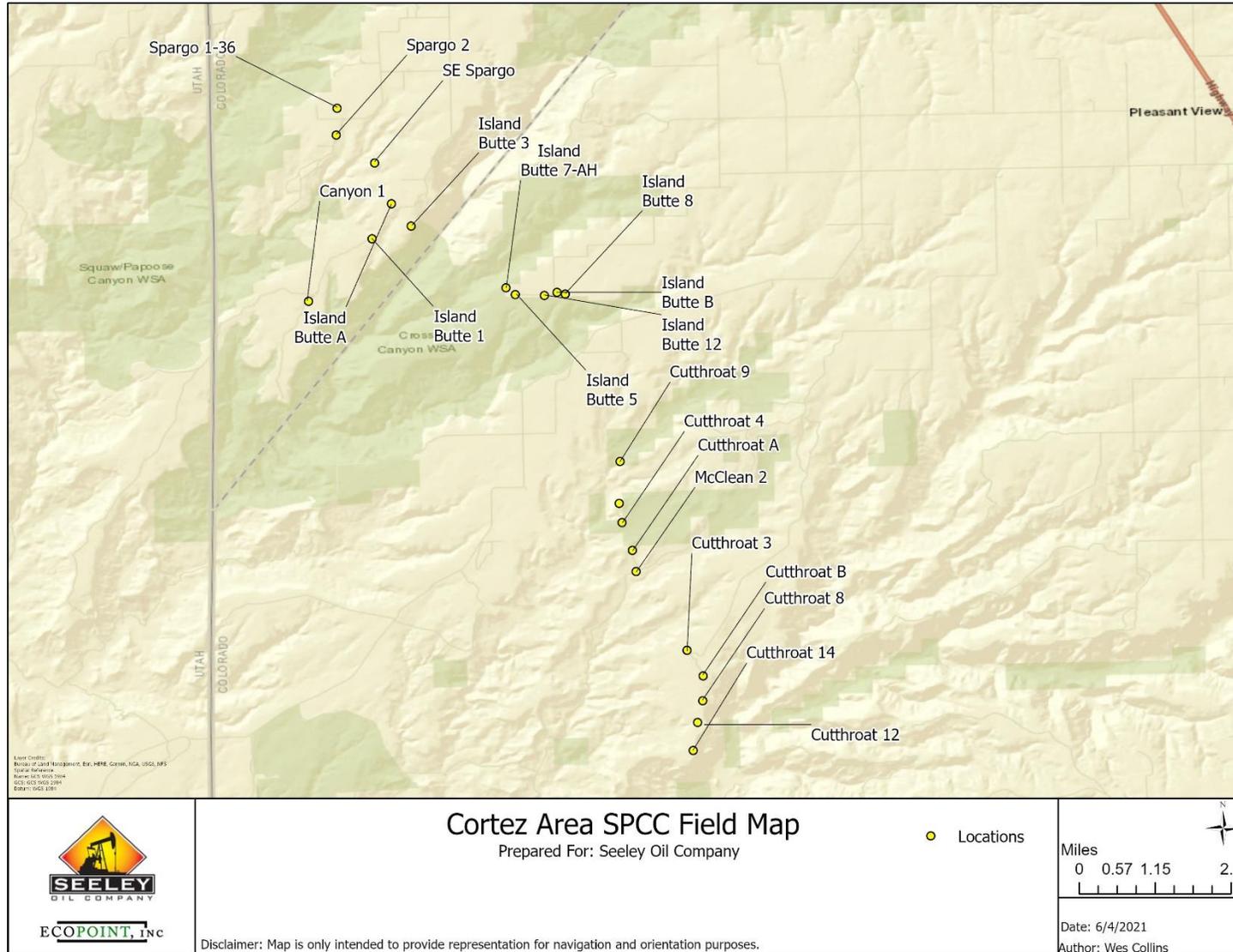


Appendix B - Amendment Log

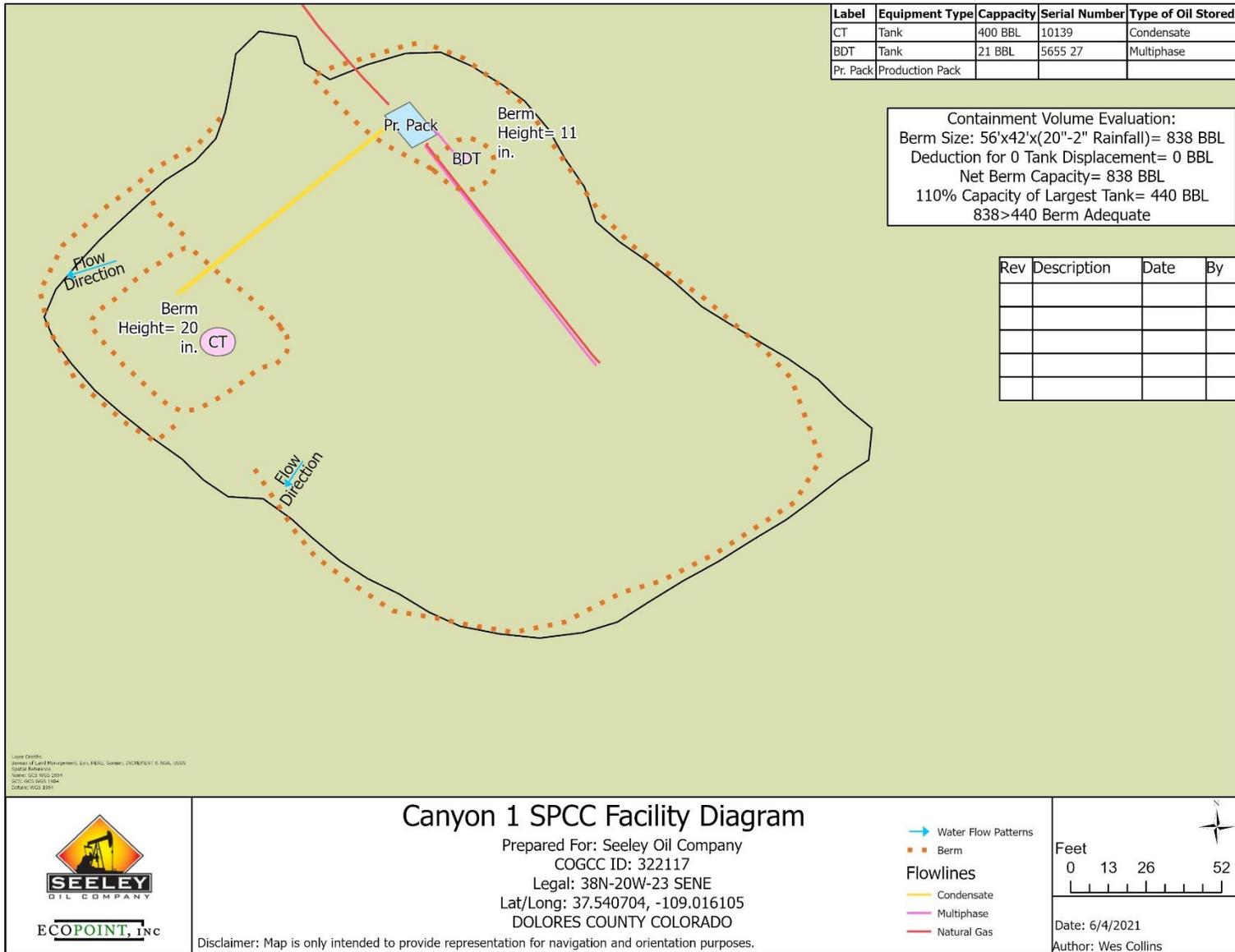
Type of Amendment	Amended Document Date	Approved by

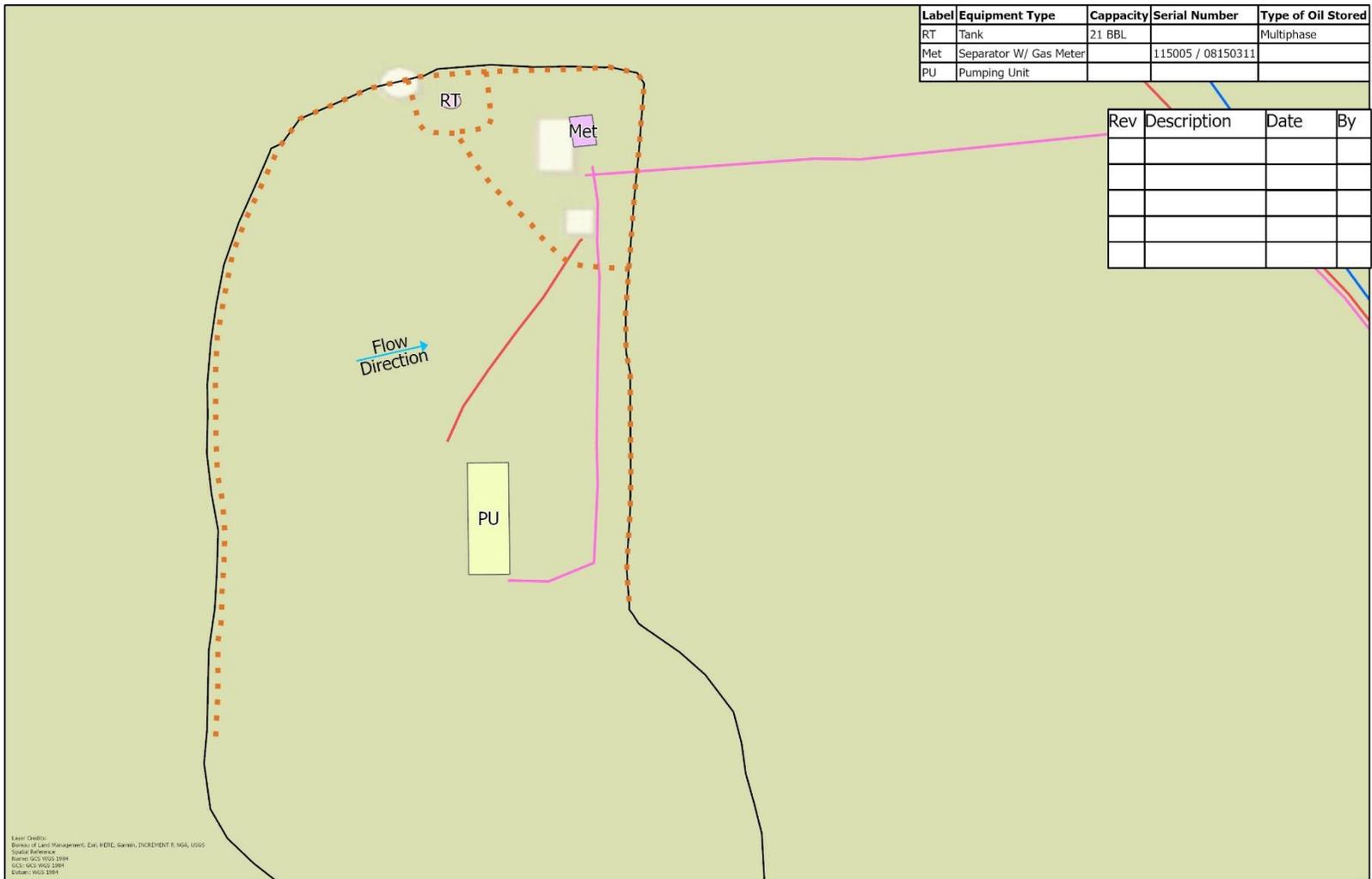


Appendix C - Field Location Map



Appendix D-Facility Diagrams





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
RT	Tank	21 BBL		Multiphase
Met	Separator W/ Gas Meter		115005 / 08150311	
PU	Pumping Unit			

Rev	Description	Date	By

Laramie County
 Bureau of Land Management, C&I, HERE, GARWIN, DICKEY/ENT R, M&A, USGS
 Spatial Reference
 NAD83 SCS 1000 2004
 NAD 83 UTM 12Q U
 Datum: WGS 1984



SEELEY
OIL COMPANY

ECOPOINT, INC

Cutthroat 3 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313536
 Legal: 37N-19W-23 SESW
 Lat/Long: 37.443756, -108.914932
 MONTEZUMA COUNTY COLORADO

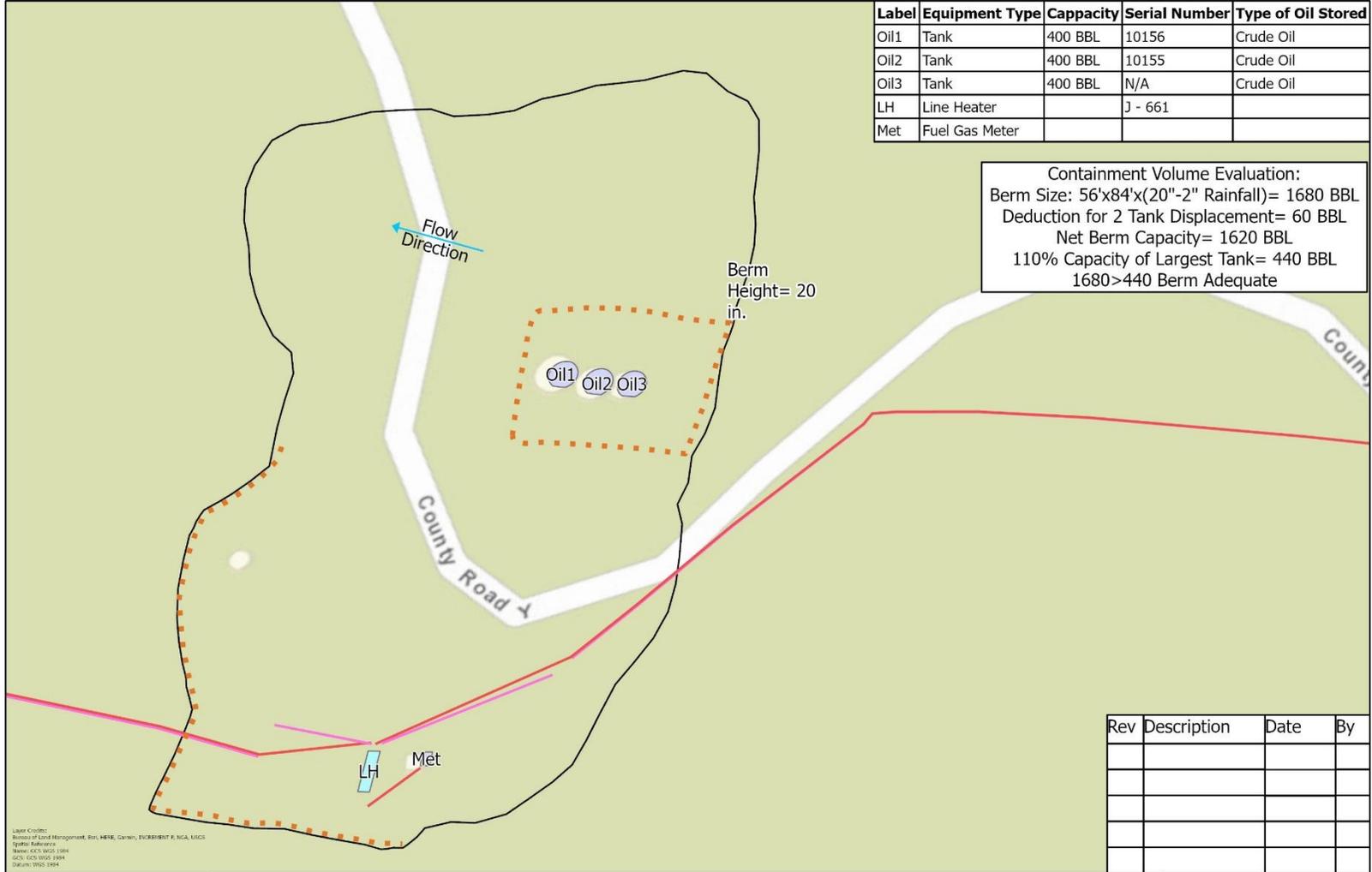
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

 Water Flow Patterns
 Berm
Flowlines
 Multiphase
 Natural Gas
 Produced Water

Feet
 0 11.25 22.5 45

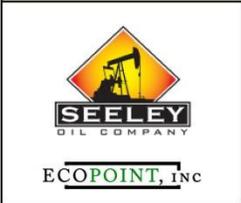

 Date: 6/4/2021
 Author: Wes Collins





Laser Control:
 Bureau of Land Management, BLM, HERR, Garano, ENCINBERT A, NCA, LLCs
 Spatial Reference:
 NAD83 CC BY GCS 1984
 GCS: NAD 83 1984
 Datum: NAD 1984

Rev	Description	Date	By



Cutthroat 4 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313539
 Legal: 37N-19W-10 SENW
 Lat/Long: 37.478846, -108.931942
 MONTEZUMA COUNTY COLORADO

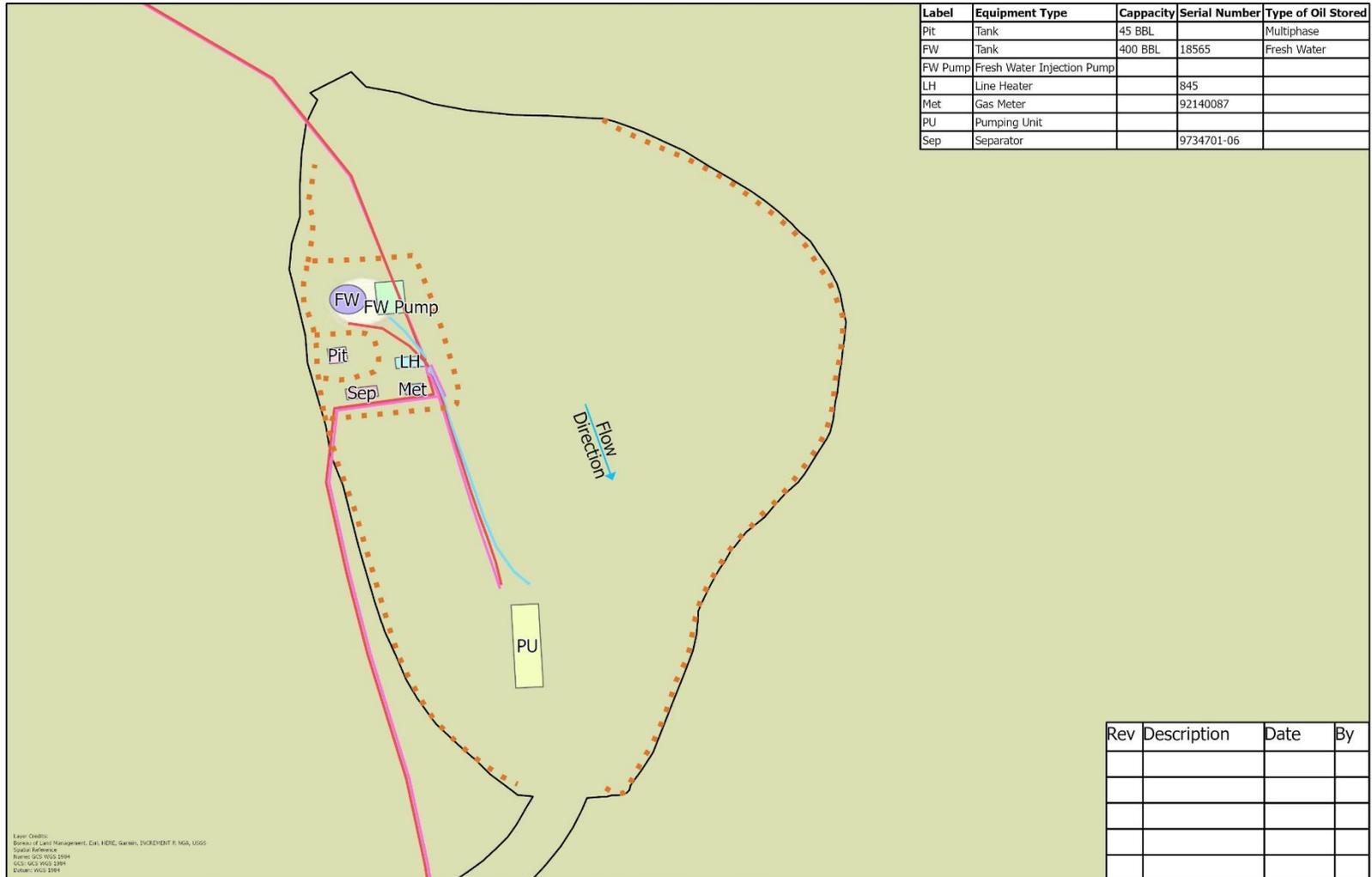
- Water Flow Patterns
- Berm
- Flowlines**
- Multiphase
- Natural Gas

Feet
 0 20 40 80

 Date: 6/4/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Laramie County
 Bureau of Land Management, Civil, HERE, GARWIN, DICKEY/ENT R, MGA, USGS
 Spatial Reference
 NAD83 SCS 1000 2694
 UTM UTM 12Q UTM 2694
 Datum: WGS 1984



Cutthroat 8 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313553
 Legal: 37N-19W-26 SWSE
 Lat/Long: 37.429939, -108.910920
 MONTEZUMA COUNTY COLORADO

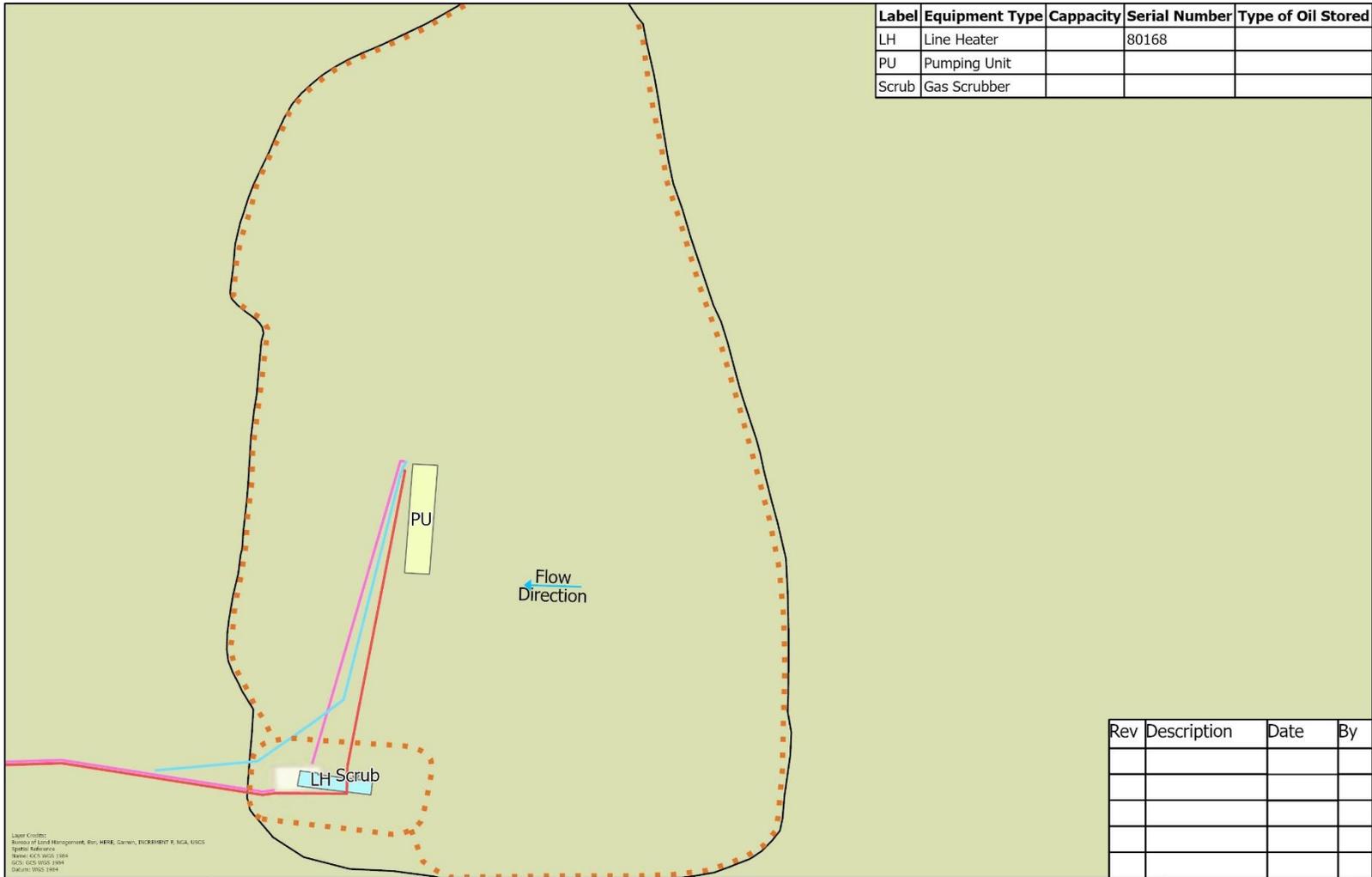
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Multiphase
- Natural Gas

Feet
 0 14.5 29 58

Date: 6/4/2021
 Author: Wes Collins





Rev	Description	Date	By

LIBERTY COUNTY
 Bureau of Land Management, Box 1000, Canton, DICKERSON P. O. BOX, USGS
 Digital Database
 Name: ACS WGS 1984
 GCS: NAD 83
 Datum: 1983
 Spheroid: GRS 80



Cutthroat 9 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313563
 Legal: 37N-19W-3 SENW
 Lat/Long: 37.495475, -108.932143
 MONTEZUMA COUNTY COLORADO

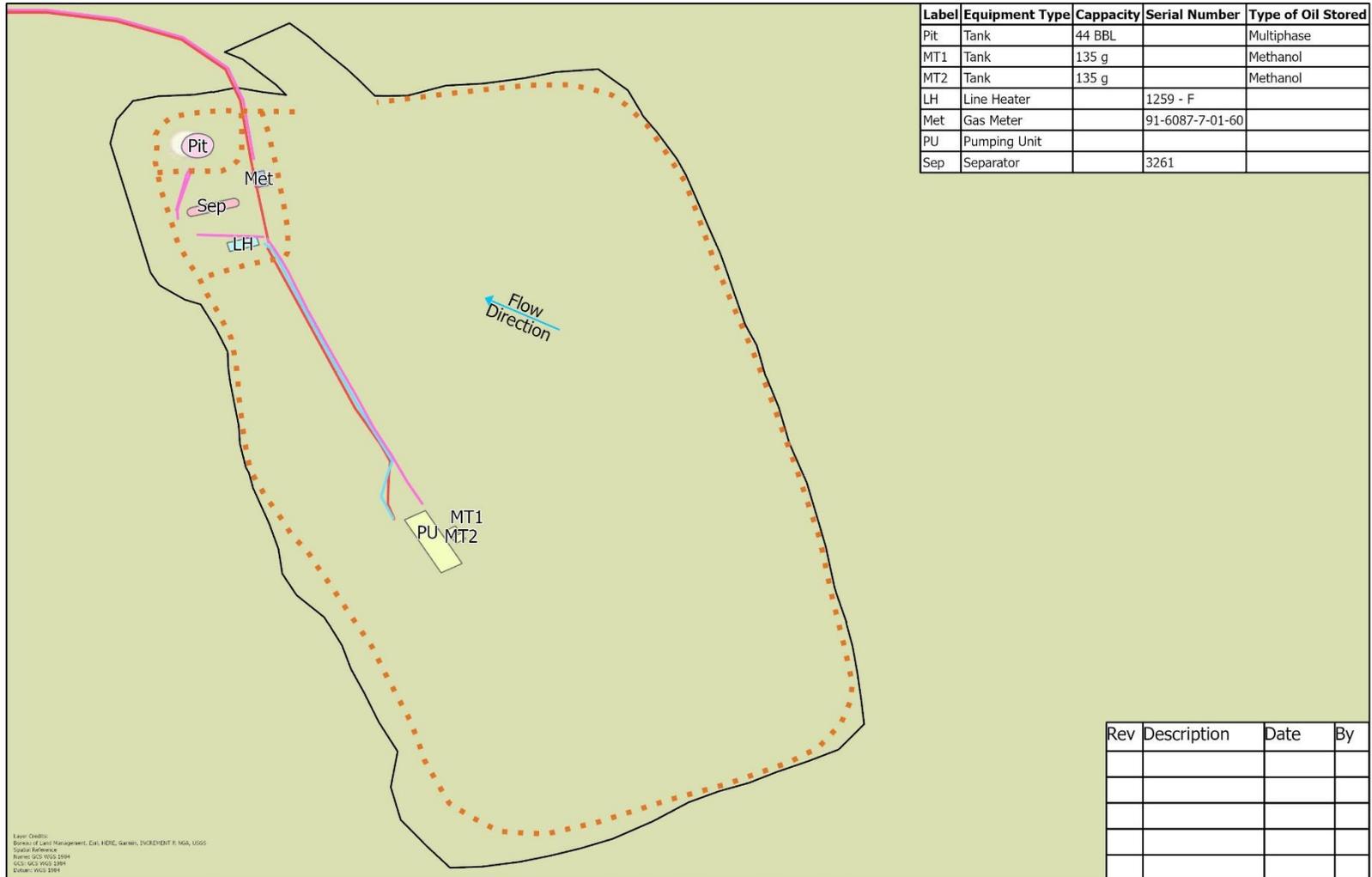
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Multiphase
- Natural Gas

Feet
 0 11.25 22.5 45

 Date: 6/4/2021
 Author: Wes Collins

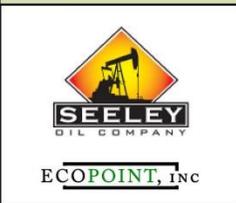




Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
Pit	Tank	44 BBL		Multiphase
MT1	Tank	135 g		Methanol
MT2	Tank	135 g		Methanol
LH	Line Heater		1259 - F	
Met	Gas Meter		91-6087-7-01-60	
PU	Pumping Unit			
Sep	Separator		3261	

Rev	Description	Date	By

Laramie County
 Bureau of Land Management, Civil, HERE, GARWIN, DICKEY & MGA, USGS
 Spatial Reference
 NAD83 SCS 1000 10000
 UTM UTM 12Q UTM 12Q
 Datum: WGS 1984



Cutthroat 12 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313578
 Legal: 37N-19W-35 SWNE
 Lat/Long: 37.424060, 108.912433
 COUNTY COLORADO

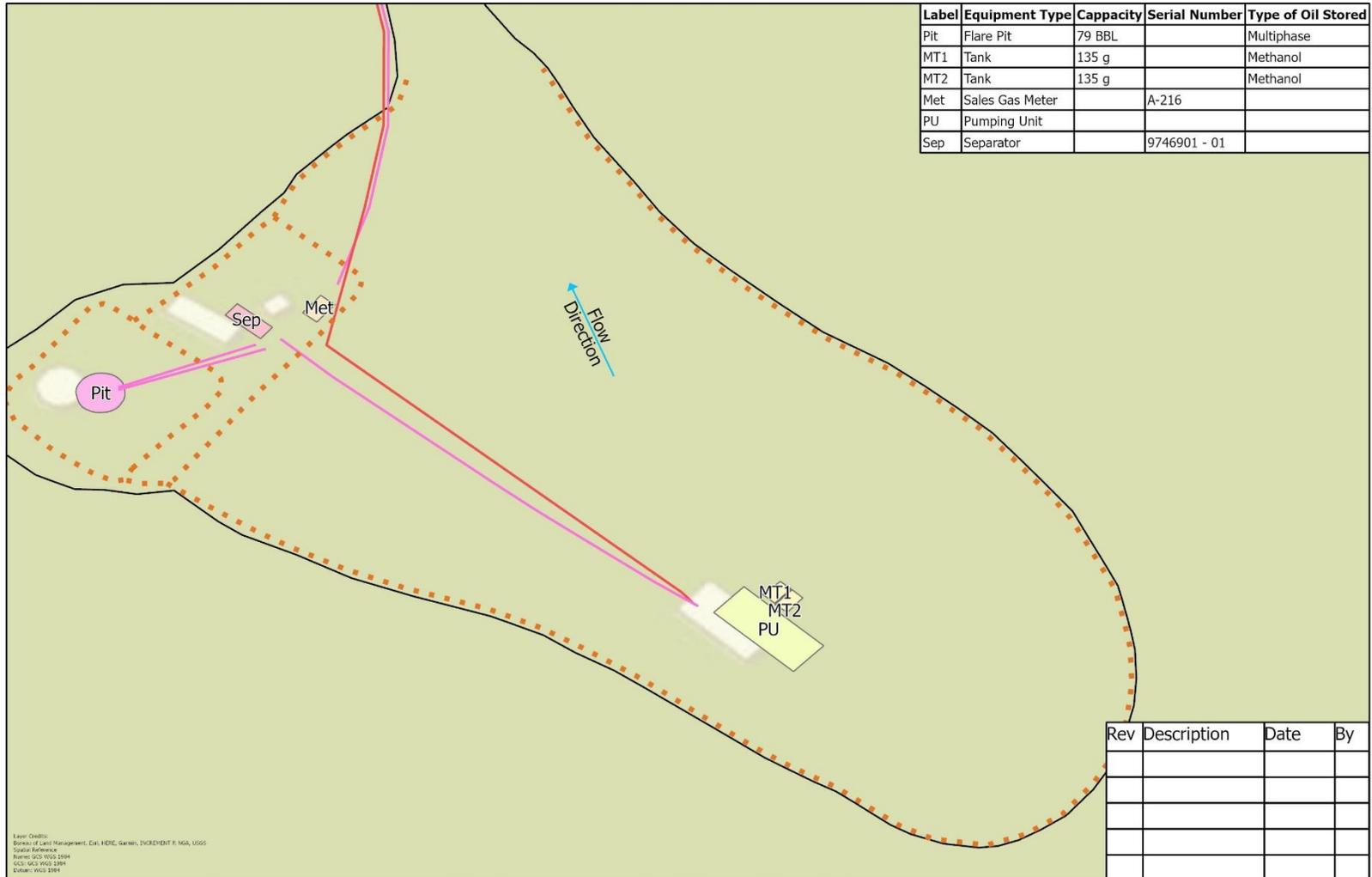
- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Multiphase
- Natural Gas

Feet
 0 14.5 29 58

Date: 6/4/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Larami Credit
 Bureau of Land Management, Col. HERE, GARWIN, DICKEY/ENT R, MGA, USGS
 Spatial Reference
 NAD83 SCS 1000 2004
 UTM UTM 12Q UTM 2004
 Datum: WGS 1984

Rev	Description	Date	By



SEELEY
OIL COMPANY



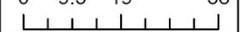
ECOPOINT, INC

Cutthroat 14 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313581
 Legal: 37N-19W-35 SESW
 Lat/Long: 37.416466, -108.913784
 MONTEZUMA COUNTY COLORADO

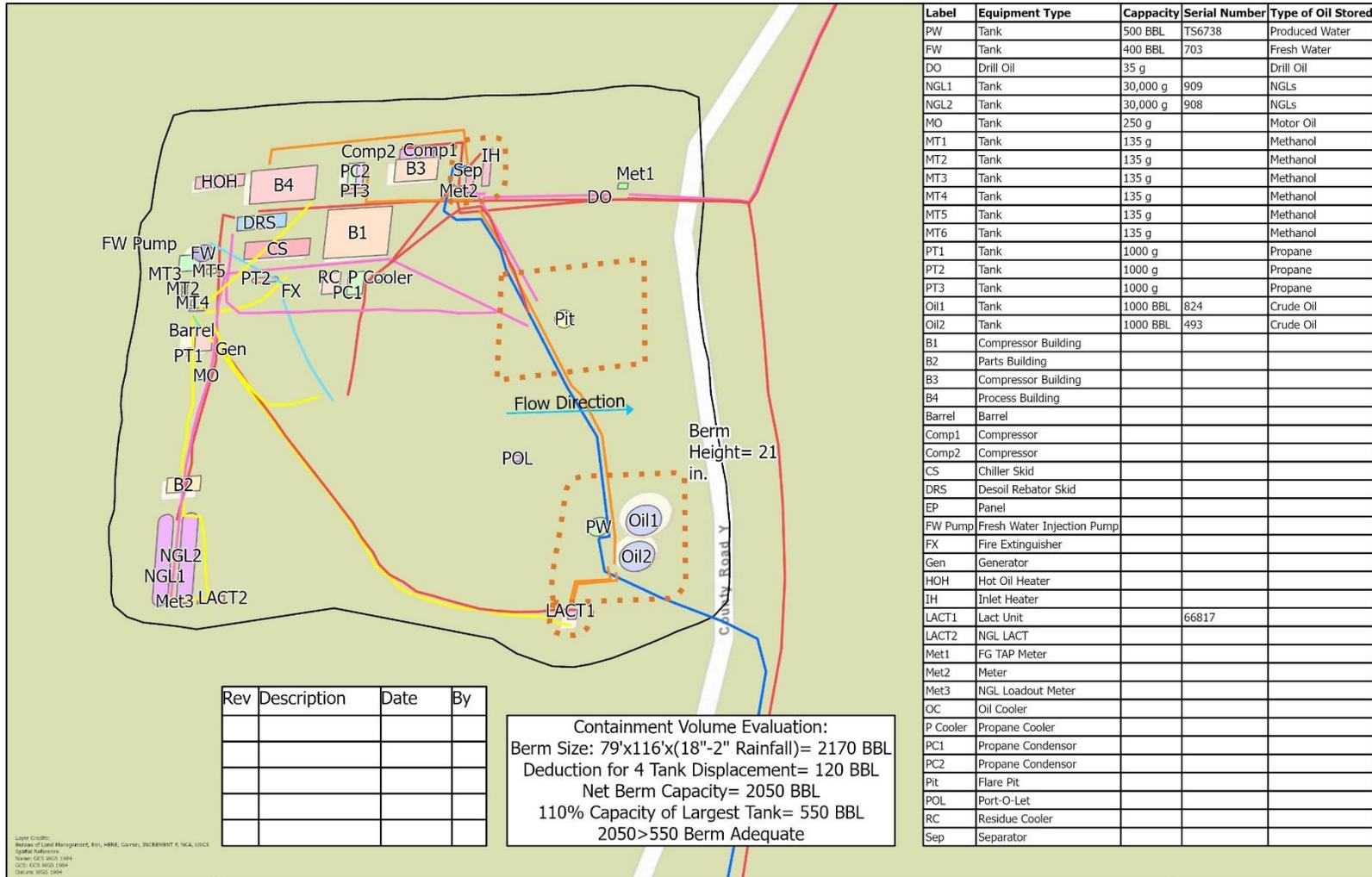
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

 Water Flow Patterns
 Berm
Flowlines
 Multiphase
 Natural Gas


 Feet
 0 9.5 19 38


Date: 6/4/2021
 Author: Wes Collins





Rev	Description	Date	By

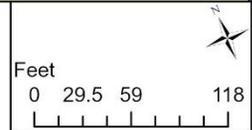
Containment Volume Evaluation:
 Berm Size: 79'x116'x(18"-2" Rainfall)= 2170 BBL
 Deduction for 4 Tank Displacement= 120 BBL
 Net Berm Capacity= 2050 BBL
 110% Capacity of Largest Tank= 550 BBL
 2050>550 Berm Adequate

Layer Credits:
 Bureau of Land Management, Eri, HERR, GAMES, INCORPORATED, NGL, UNCS
 Spatial Reference:
 Name: GCS_NAD83_2011
 CSRS: ICS_8002_1984
 Datum: NAD 83
 Date: 10/1/2011

Cutthroat A SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313527
 Legal: 37N-19W-10 SWSE
 Lat/Long: 37.471226, -108.929262
 MONTEZUMA COUNTY COLORADO

- Water Flow Patterns
- Berm
- Flowlines
- Electric
- Fresh Water
- Multiphase
- Natural Gas
- Oil
- Produced Water

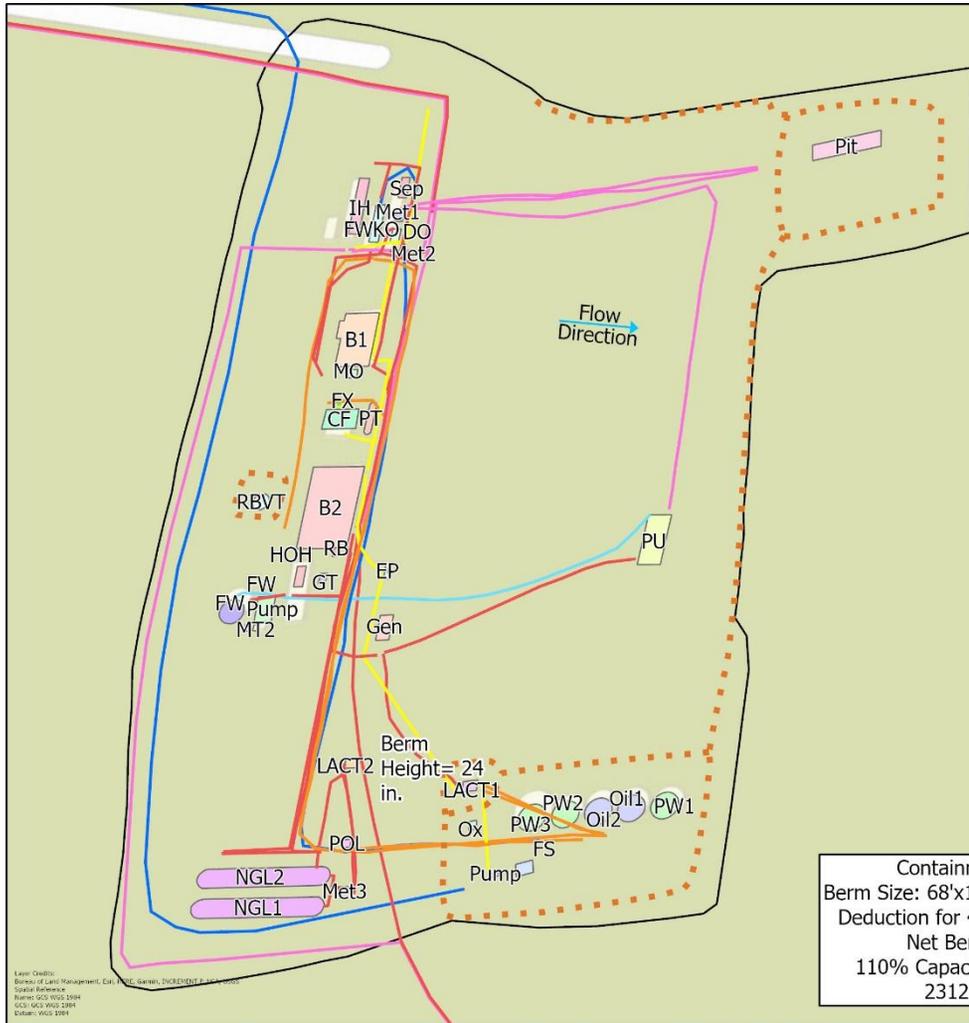


Date: 6/4/2021
 Author: Wes Collins



Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
Oil1	Tank	500 BBL	2177	Crude Oil
Oil2	Tank	500 BBL	2176	Crude Oil
PW1	Tank	500 BBL	2178	Produced Water
PW2	Tank	500 BBL	25507	Produced Water
PW3	Tank	500 BBL	25505	Produced Water
FW	Tank	400 BBL	ELT9A14501-14	Fresh Water
DO	Drill Oil	35 g		Drill Oil
GT	Tank	300 g		Glycol
NGL1	Tank	30,000 g		NGLs
NGL2	Tank	30,000 g		NGLs
MO	Tank	250 g		Motor Oil
Ox	Oxidizer	180 g		Oxidizer
MT1	Tank	135 g		Methanol
MT2	Tank	135 g		Methanol
PT	Tank	1000 g		Propane
RBVT	Reboiler Vent Tank			
B1	Compressor Building			
B2	Process Building			
CF	Cooler Fan			
EP	Electric Panel			
FS	Filter Skid			
FW Pump	Fresh Water Injection Pump			
FWKO	Free Water Knock Out			
FX	Fire Extinguisher			
Gen	Generator			
HOH	Hot Oil Heater			
IH	Inlet Heater			
LACT1	Lact Unit		142447	
LACT2	NGL LACT			
Met1	Test Meter			
Met2	Observation Meter			
Met3	NGL Loadout Meter			
Pit	Tank			Multiphase
POL	Port-O-Let			
PU	Pumping Unit			
Pump	Pump			
RB	Reboiler			
Sep	Separator			

Containment Volume Evaluation:
 Berm Size: 68'x106'x(24"-2" Rainfall)= 2495 BBL
 Deduction for 4 Tank Displacement= 183 BBL
 Net Berm Capacity= 2312 BBL
 110% Capacity of Largest Tank= 550 BBL
 2312>550 Berm Adequate

Rev	Description	Date	By

Scale: 0=100
 Bureau of Land Management, EIT, 1100, Denver, CO 80202
 Spatial Reference: NAD83
 Project: 37N-19W-26 SWNE
 Date: 6/4/2021
 Author: WGS 2014



Cutthroat B SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313548
 Legal: 37N-19W-26 SWNE
 Lat/Long: 37.436686, -108.910681
 MONTEZUMA COUNTY COLORADO

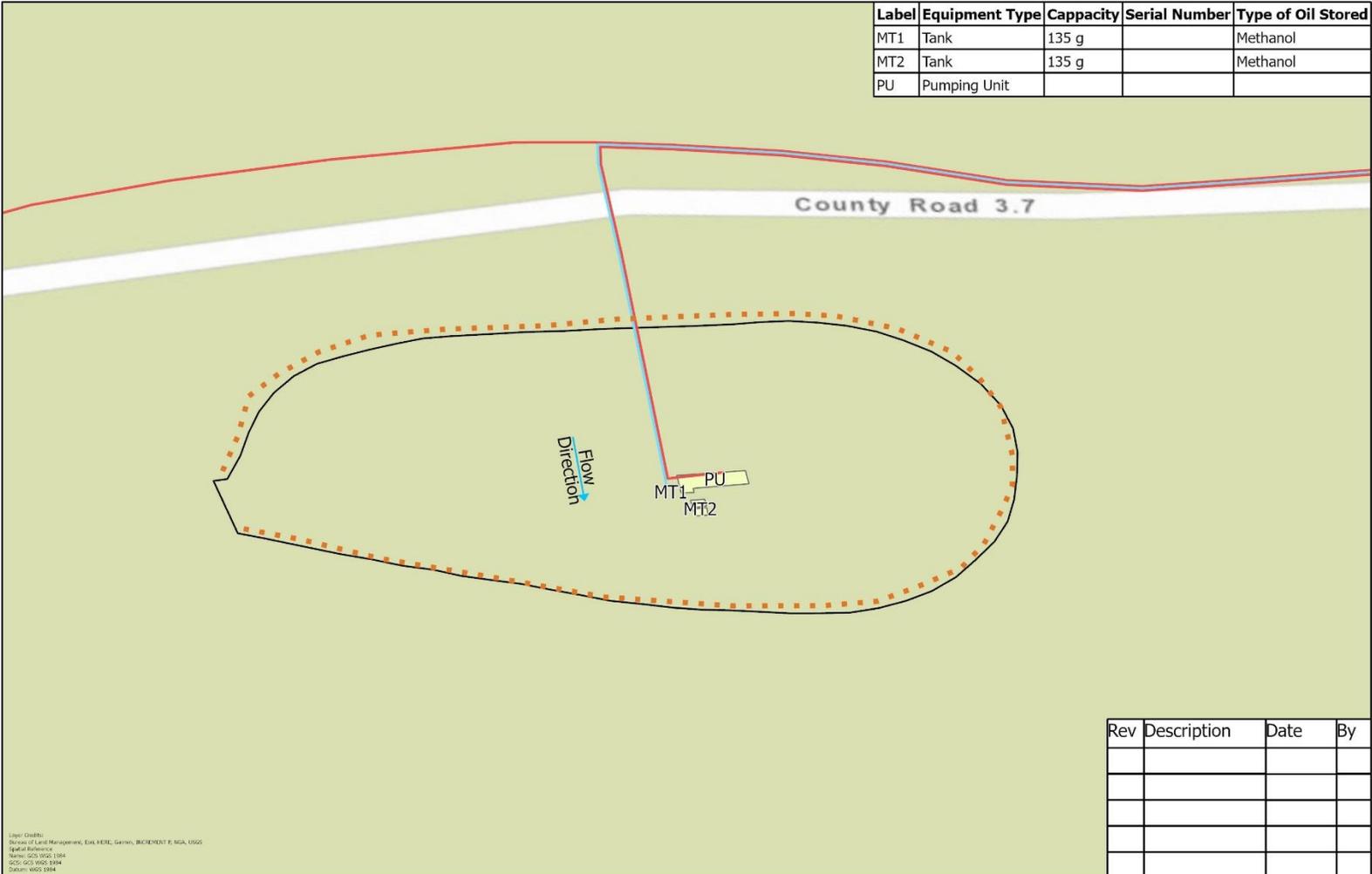
- Water Flow Patterns
- Fresh Water
- Berm
- Multiphase
- Natural Gas
- Oil
- Electric
- Produced Water

Feet
 0 25.5 51 102

Date: 6/4/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
MT1	Tank	135 g		Methanol
MT2	Tank	135 g		Methanol
PU	Pumping Unit			

Rev	Description	Date	By

Legal: 38N-20W-13
 Bureau of Land Management, East, Here, Garwin, INCIDENT #, NGA, USGS
 Equal Distance
 2010: 605 1900 1894
 2010: 605 1900 1894
 Datum: NAD83



Island Butte 1 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 381605
 Legal: 38N-20W-13 NENE
 Lat/Long: 37.557374, -108.998475
 DOLORES COUNTY COLORADO

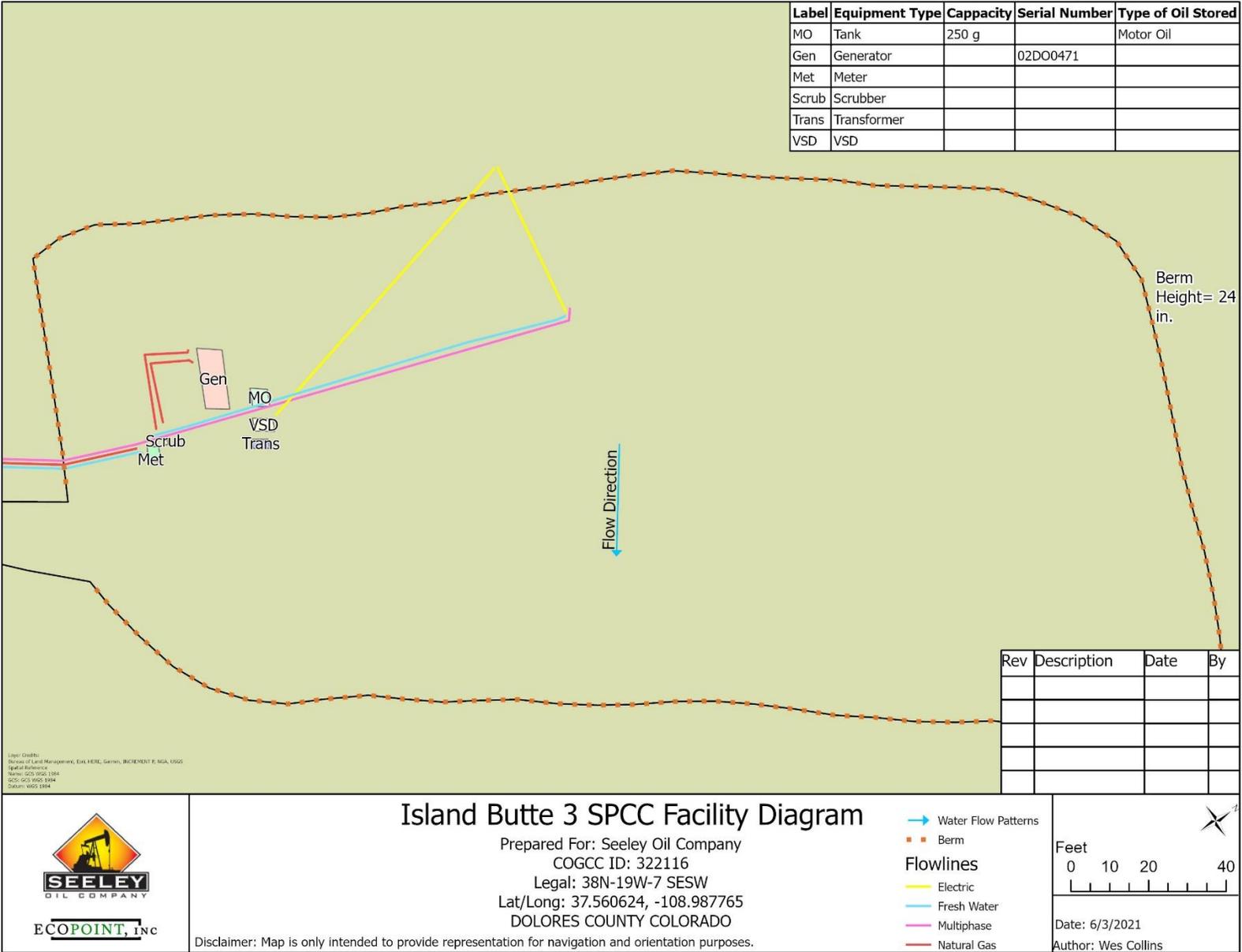
- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Natural Gas

Feet
 0 17.5 35 70

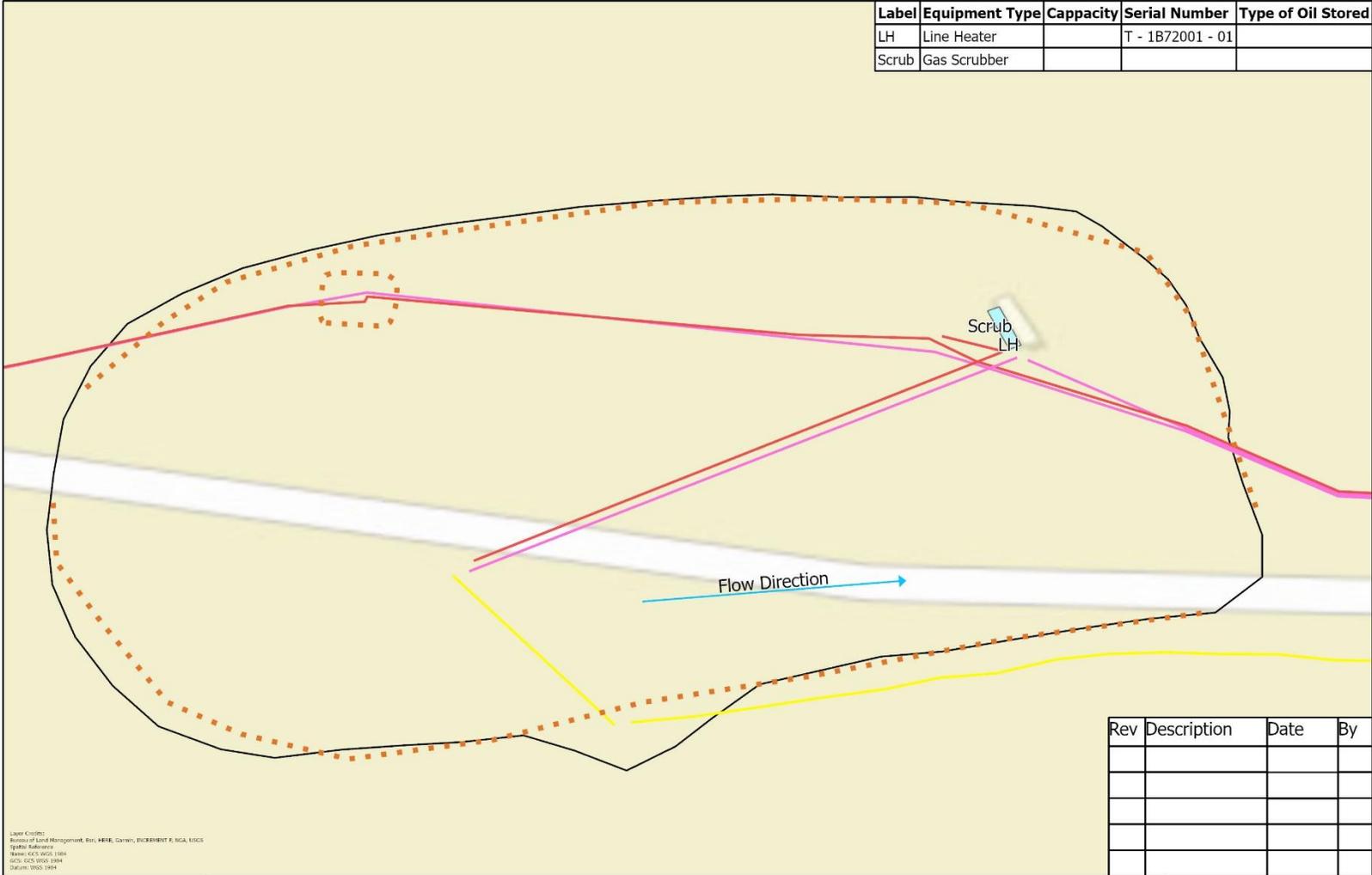
 Date: 6/3/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
LH	Line Heater		T - 1B72001 - 01	
Scrub	Gas Scrubber			



Rev	Description	Date	By

LARRY CRIBBS
 Bureau of Land Management, Box 1086, Canon, COLORADO 81212, USA
 Digital Signature
 Name: LARRY CRIBBS
 Date: 2021.06.03 10:04
 Status: 1952.1934



Island Butte 5 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313557
 Legal: 38N-19W-20 NENE
 Lat/Long: 37.541434, -108.959774
 MONTEZUMA COUNTY COLORADO

- Water Flow Patterns
- - - Berm
- Flowlines**
- Electric
- Multiphase
- Natural Gas

N

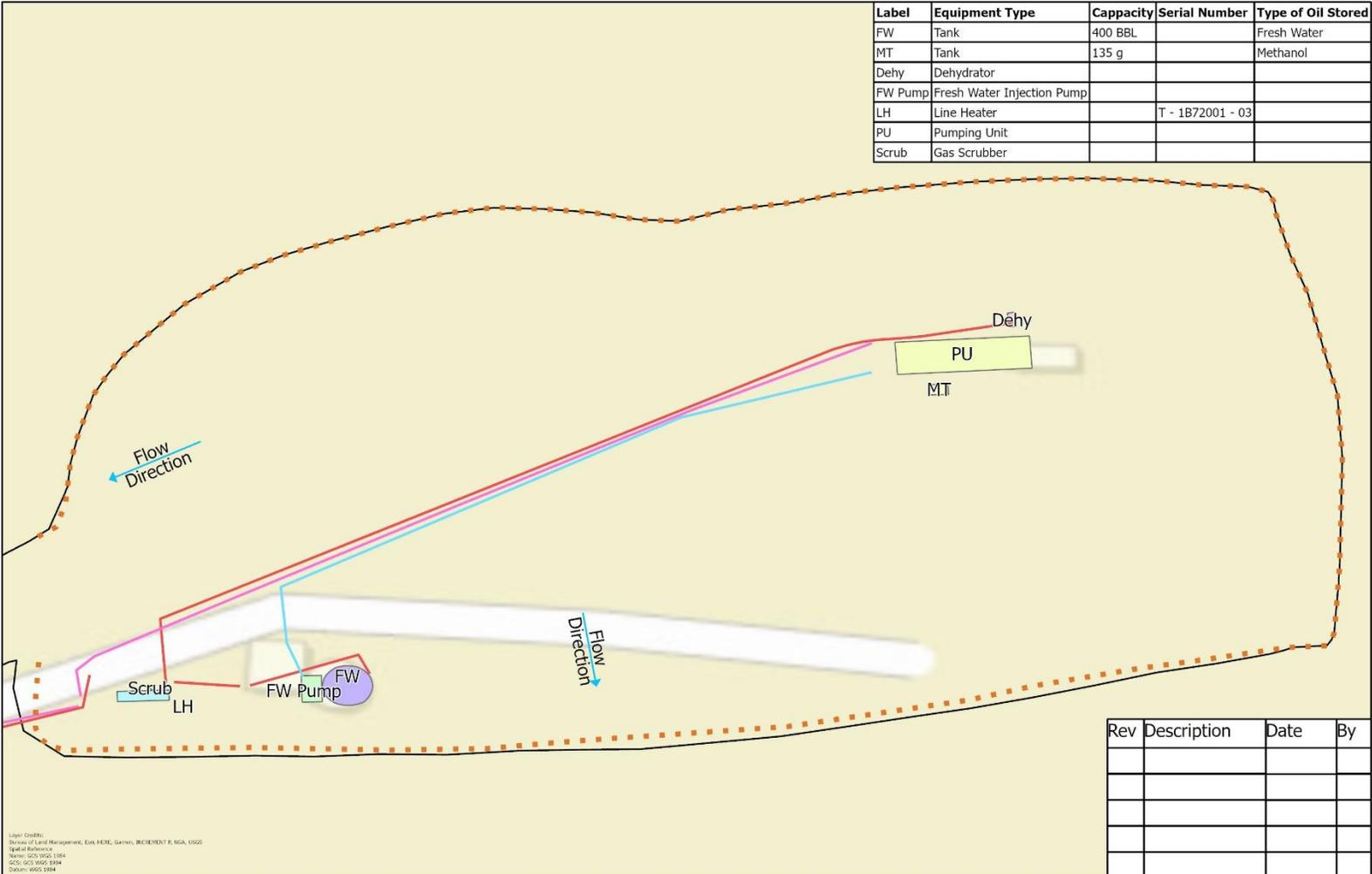
Feet

0 8.75 17.5 35

Date: 6/3/2021
Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Legal: 38N-19W-20
 Bureau of Land Management, East, HERE, Garino, INCIDENT #, 85A, 1525
 Equal Surface or
 Water, 505 9100, 1984
 2013-01-09 09:19:04
 Datum: NAD83



Island Butte 7-AH SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313561
 Legal: 38N-19W-20 NENE
 Lat/Long: 37.543344, -108.962264
 MONTEZUMA COUNTY COLORADO

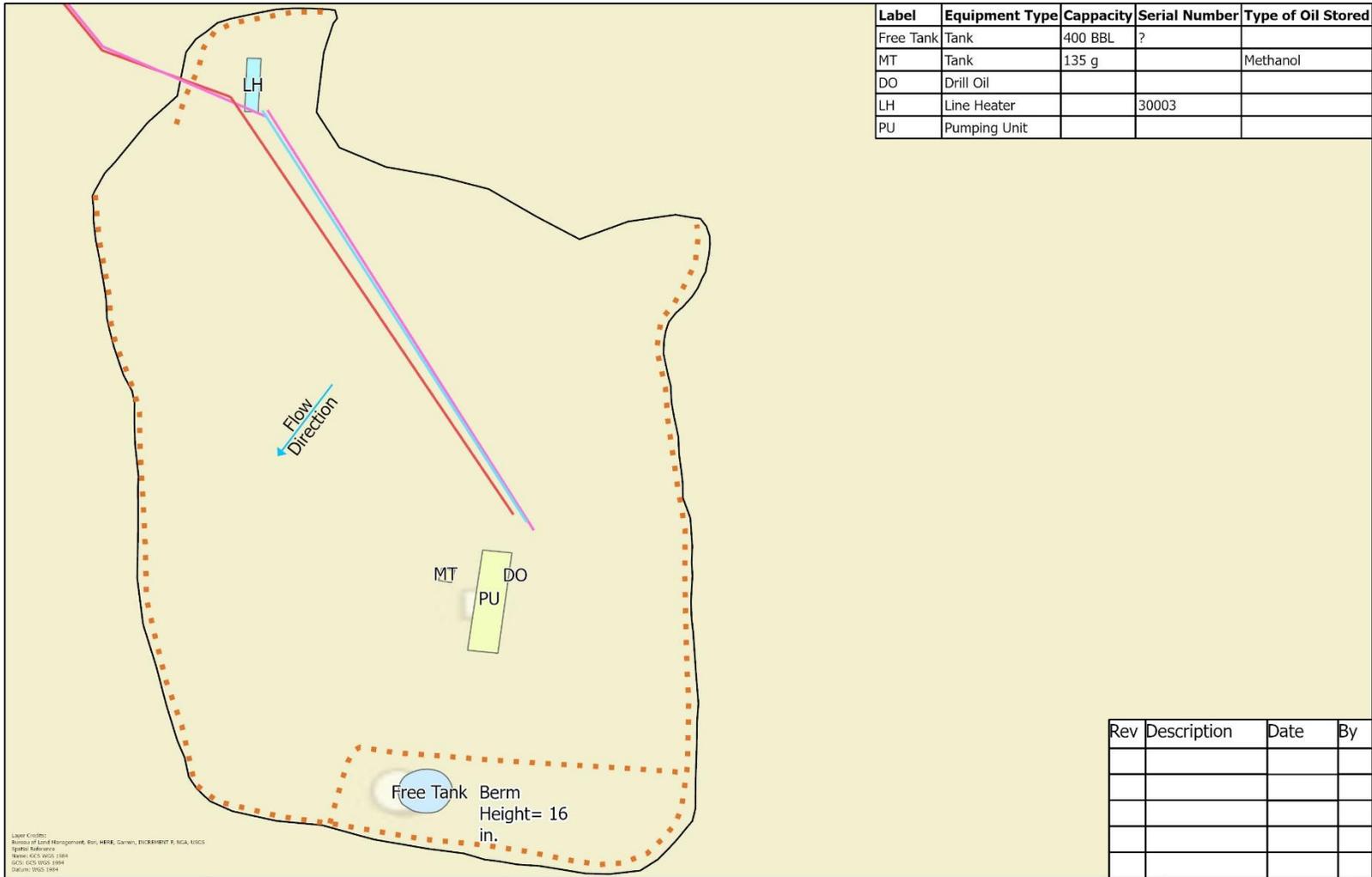
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Multiphase
- Natural Gas

Feet
 0 8.75 17.5 35

Date: 6/3/2021
 Author: Wes Collins





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
Free Tank	Tank	400 BBL	?	
MT	Tank	135 g		Methanol
DO	Drill Oil			
LH	Line Heater		30003	
PU	Pumping Unit			

Rev	Description	Date	By

LARRY CHRISTY
 Bureau of Land Management, Box 1086, Canon, COLORADO, CO, USA
 Digital Signature
 Name: LARRY CHRISTY
 CO: CO
 STATE: CO
 STATE: CO



Island Butte 8 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313558
 Legal: 38N-19W-21 NWNE
 Lat/Long: 37.541314, -108.946173
 MONTEZUMA COUNTY COLORADO

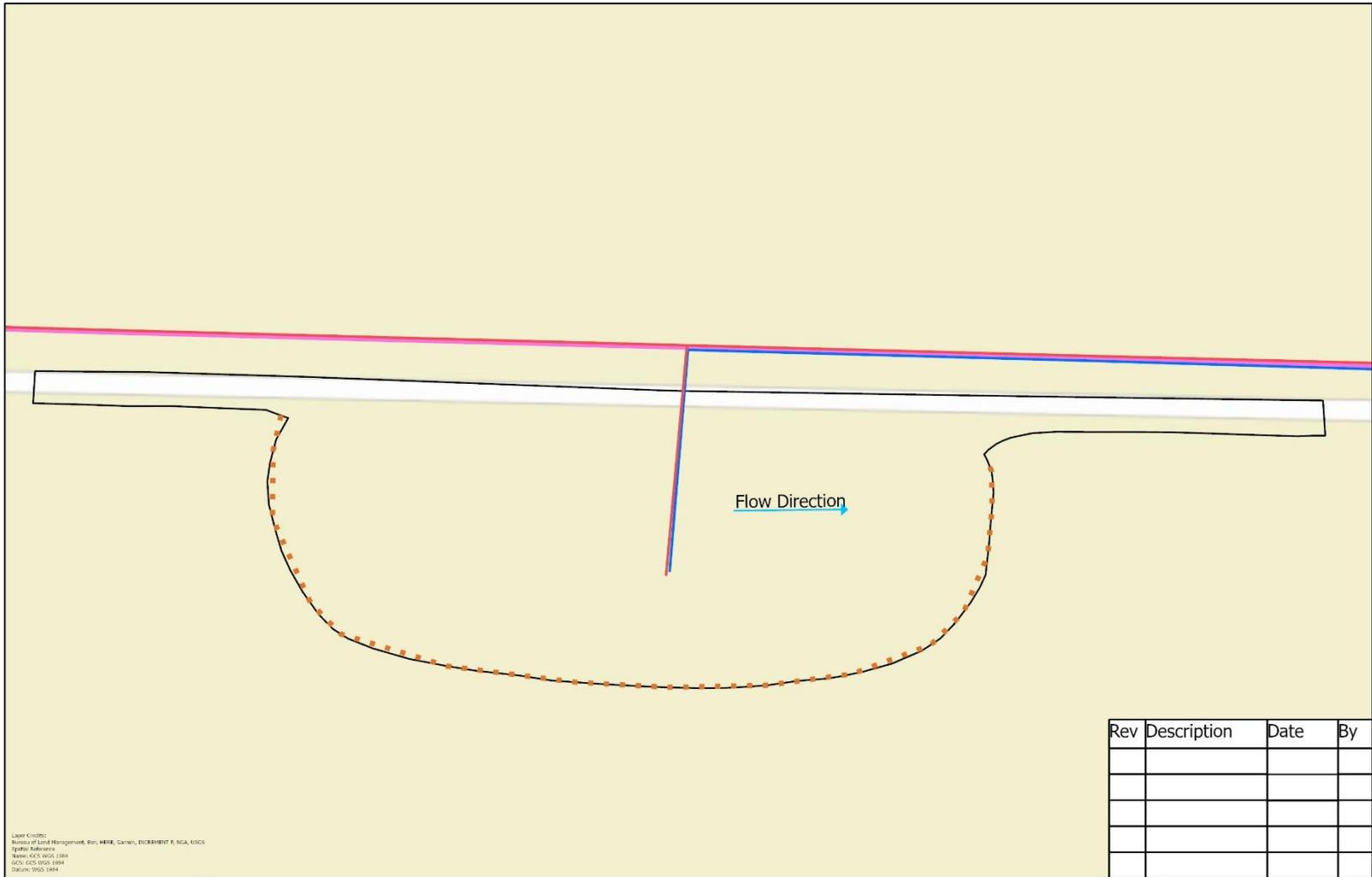
- Water Flow Patterns
- Berm
- Flowlines**
- Fresh Water
- Multiphase
- Natural Gas

Feet
 0 9.5 19 38

Date: 6/4/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Rev	Description	Date	By

Layer Created:
 Bureau of Land Management, Box 1000, Canon, COLORADO, CO, USA
 Digital Reference:
 Name: ACS 1000 1000
 GCS: GCS 1000 1000
 Datum: 1983 1984



Island Butte 12 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313571
 Legal: 38N-19W-21 NENW
 Lat/Long: 37.541044, -108.951864
 MONTEZUMA COUNTY COLORADO

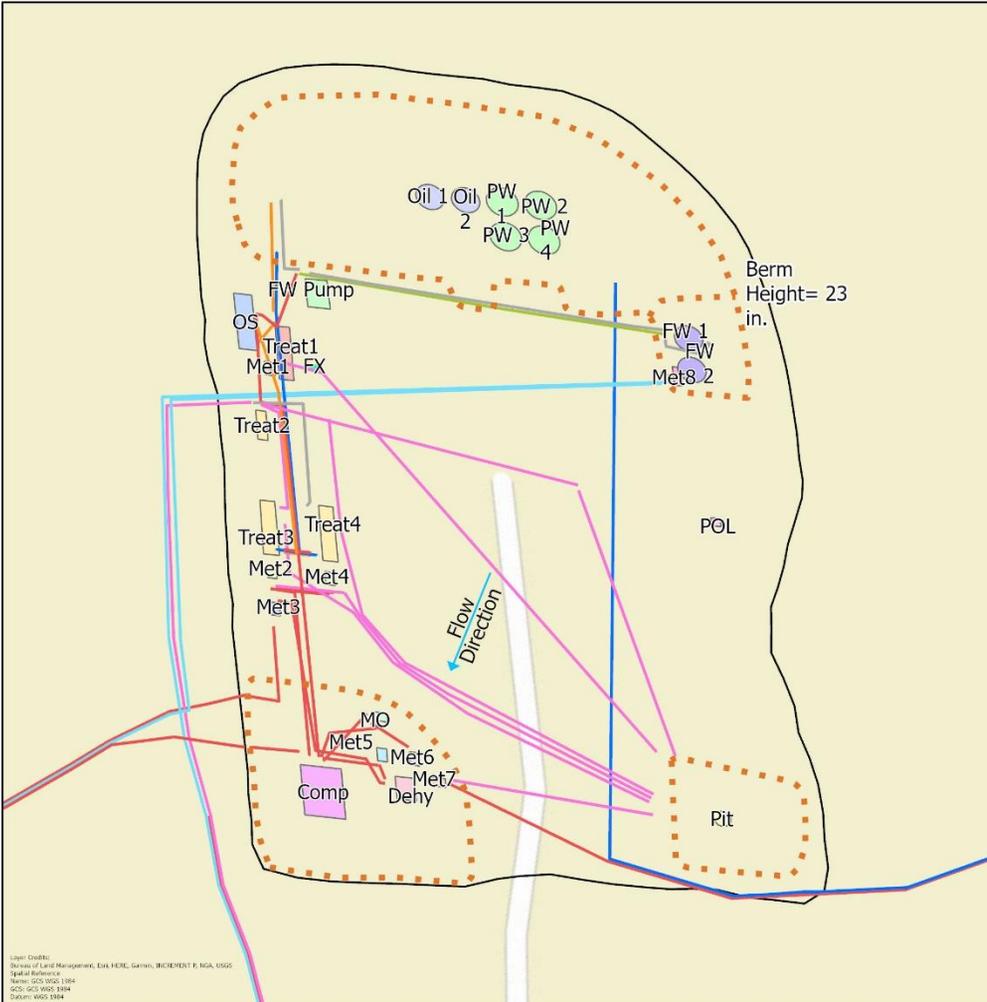
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Multiphase
- Natural Gas
- Produced Water

Feet
 0 15 30 60

 Date: 6/3/2021
 Author: Wes Collins





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
PW 1	Tank	500 BBL	120159028	Produced Water
PW 2	Tank	500 BBL	120159026	Produced Water
PW 3	Tank	500 BBL	102161943	Produced Water
PW 4	Tank	500 BBL	120159023	Produced Water
Oil 1	Tank	400 BBL	500421	Crude Oil
Oil 2	Tank	400 BBL	500422	Crude Oil
FW 1	Tank	300 BBL	42-24149	Fresh Water
FW 2	Tank	300 BBL	706	Fresh Water
MO	Tank	250 g		Motor Oil
FX	Fire Extinguisher			
Pit	Flare Pit			
Comp	Compressor			
Dehy	Dehydrator			
FW Pump	Fresh Water Injection Pump			
Met1	Fuel Gas Meter			
Met2	LP Meter			
Met3	Gas Meter			
Met4	LP Meter			
Met5	Comp Meter			
Met6	Fuel Gas Meter			
Met7	Master Meter			
Met8	FW Meter			
OS	Oil Stabilizer			
POL	Port-O-Let			
Treat1	Recycle Treater			
Treat2	Treater			
Treat3	Treater			
Treat4	Treater			

Containment Volume Evaluation:
 Berm Size: 63'x144'x(23"-2" Rainfall)= 2822 BBL
 Deduction for 5 Tank Displacement= 160 BBL
 Net Berm Capacity= 2668 BBL
 110% Capacity of Largest Tank= 550 BBL
 2668 > 550 Berm Adequate

Rev	Description	Date	By

Sheet 024810
 Division of Land Management, Est. HERE, GARDNER, BUCHHEIT & MGA, 10550
 Spauld Building
 Denver, CO 80202-1884
 MCD: (303) 966-1184
 MCD: (303) 966-1184
 Datum: NAD 83 1984



Island Butte A SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 322115
 Legal: 38N-19W-7 SWNW
 Lat/Long: 37.566794, -108.993015
 DOLORES COUNTY COLORADO

- Water Flow Patterns
- Berm
- Flowlines
- Electric
- Fresh Water
- Multiphase
- Natural Gas
- Oil
- Other
- Produced Water

Feet
 0 24 48 96

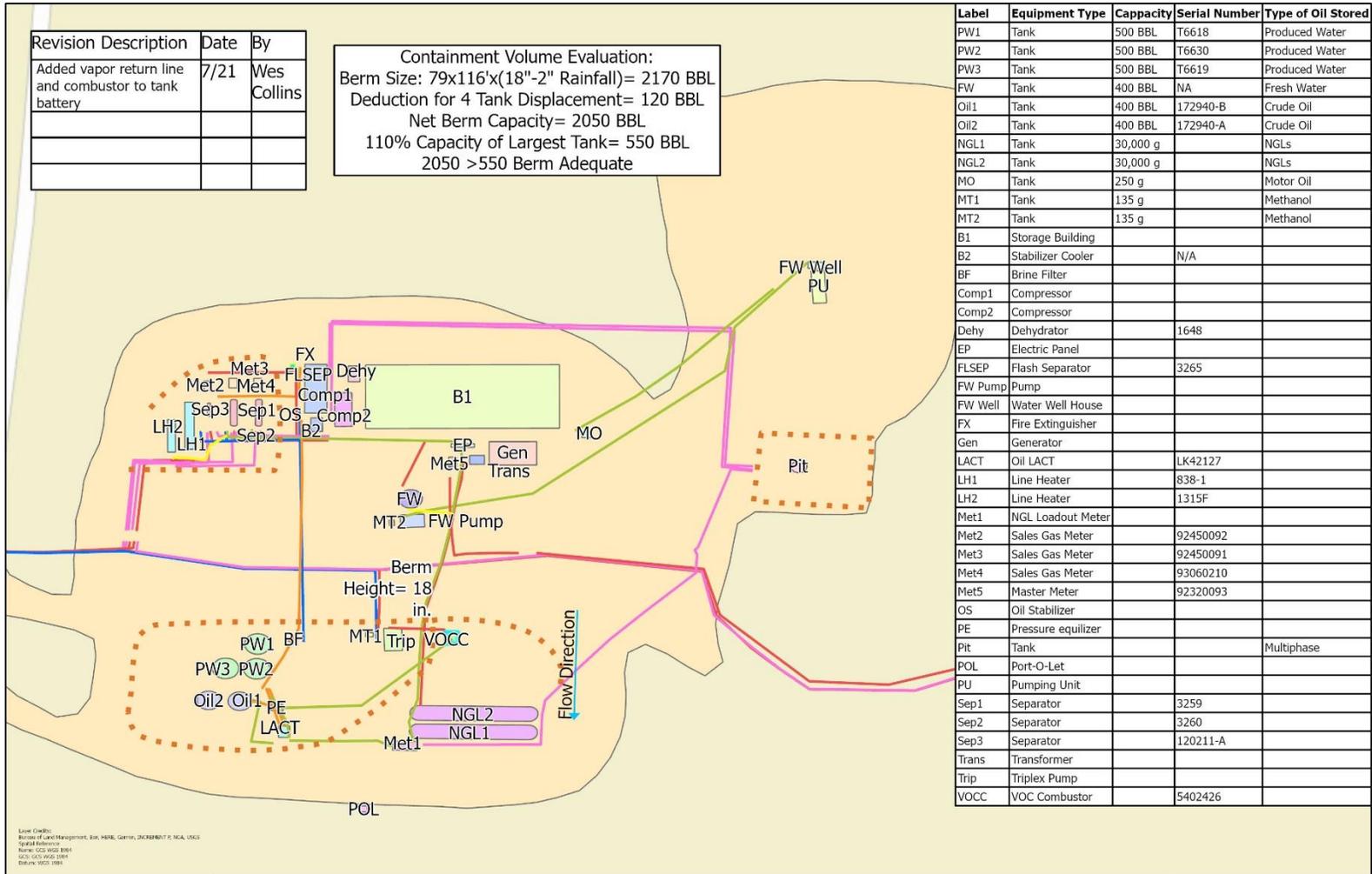
Date: 6/3/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.



Revision Description	Date	By
Added vapor return line and combustor to tank battery	7/21	Wes Collins

Containment Volume Evaluation:
 Berm Size: 79x116'x(18"-2" Rainfall)= 2170 BBL
 Deduction for 4 Tank Displacement= 120 BBL
 Net Berm Capacity= 2050 BBL
 110% Capacity of Largest Tank= 550 BBL
 2050 >550 Berm Adequate



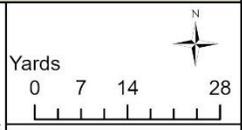
Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
PW1	Tank	500 BBL	T6618	Produced Water
PW2	Tank	500 BBL	T6630	Produced Water
PW3	Tank	500 BBL	T6619	Produced Water
FW	Tank	400 BBL	NA	Fresh Water
Oil1	Tank	400 BBL	172940-B	Crude Oil
Oil2	Tank	400 BBL	172940-A	Crude Oil
NGL1	Tank	30,000 g		NGLs
NGL2	Tank	30,000 g		NGLs
MO	Tank	250 g		Motor Oil
MT1	Tank	135 g		Methanol
MT2	Tank	135 g		Methanol
B1	Storage Building			
B2	Stabilizer Cooler		N/A	
BF	Brine Filter			
Comp1	Compressor			
Comp2	Compressor			
Dehy	Dehydrator		1648	
EP	Electric Panel			
FLSEP	Flash Separator		3265	
FW Pump	Pump			
FW Well	Water Well House			
FX	Fire Extinguisher			
Gen	Generator			
LACT	Oil LACT		LK42127	
LH1	Line Heater		838-1	
LH2	Line Heater		1315F	
Met1	NGL Loadout Meter			
Met2	Sales Gas Meter		92450092	
Met3	Sales Gas Meter		92450091	
Met4	Sales Gas Meter		93060210	
Met5	Master Meter		92320093	
OS	Oil Stabilizer			
PE	Pressure equalizer			
Pit	Tank			Multiphase
POL	Port-O-Let			
PU	Pumping Unit			
Sep1	Separator		3259	
Sep2	Separator		3260	
Sep3	Separator		120211-A	
Trans	Transformer			
Trip	Triplex Pump			
VOCC	VOC Combustor		5402426	

Level: 0=0ft
 Survey of Land Management, Inc. HERR, Garner, 2008/01/17 NGL, USGS
 Digital Elevation
 Name: CCS_002_0001
 GCS: NAD_83
 Datum: NAD_83
 Units: Feet



Island Butte B SPCC Diagram
 Prepared For: Seeley Oil Company
 COGCC ID: N/A
 Legal: 38N-19W-21 NWNE
 Lat/Long: 37.541878, 108.948376
 Montezuma County, Colorado

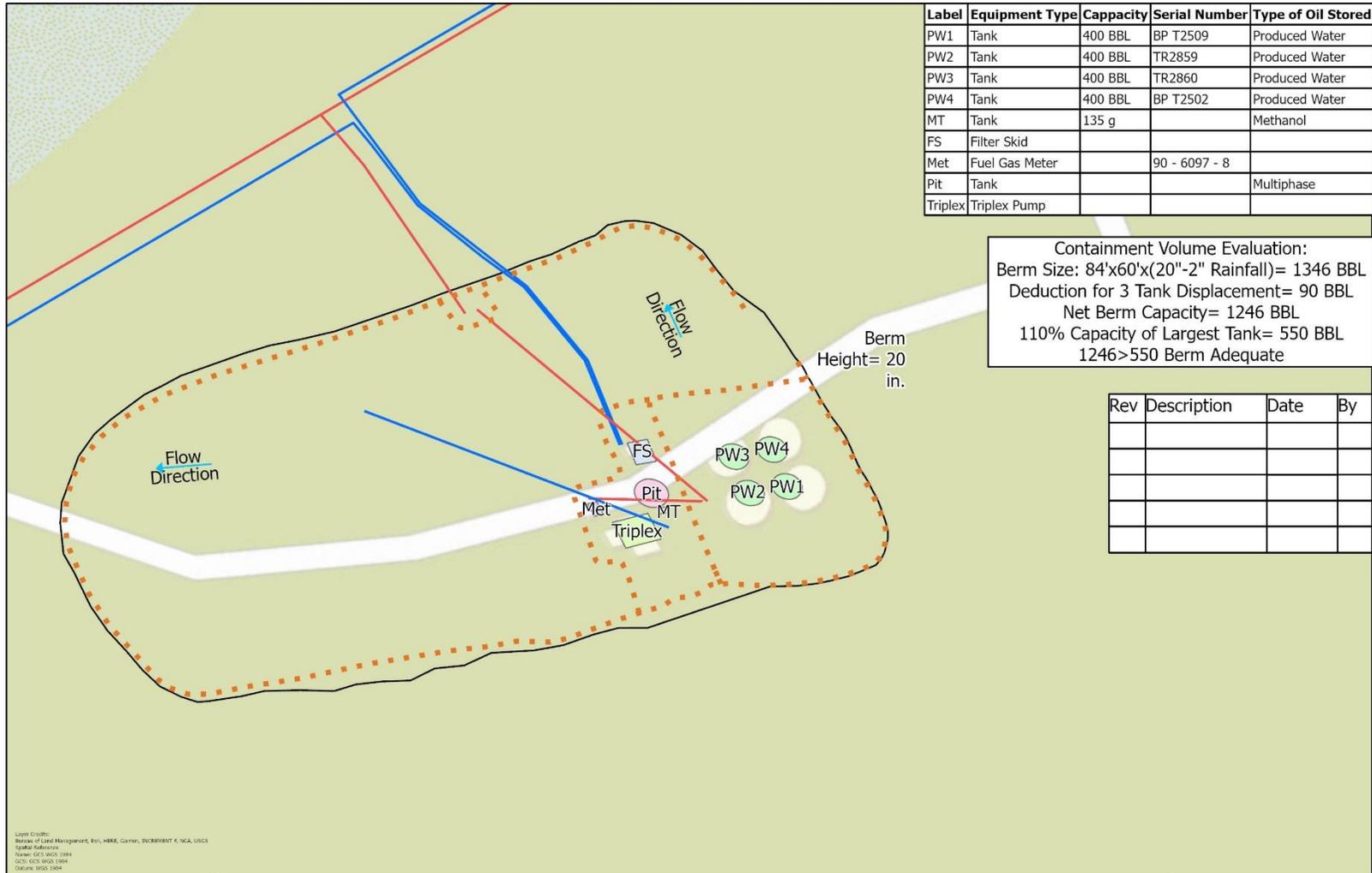
- Water Flow Patterns**
 — Blue arrow
- Berm**
 — Dashed orange line
- Flowlines**
 — Yellow line (Electric)
 — Red line (Natural Gas)
 — Orange line (Oil)
 — Green line (Other)
 — Blue line (Produced Water)
- Multiphase**
 — Pink line



Date: 8/25/2021
 Author: Wes Collins

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
PW1	Tank	400 BBL	BP T2509	Produced Water
PW2	Tank	400 BBL	TR2859	Produced Water
PW3	Tank	400 BBL	TR2860	Produced Water
PW4	Tank	400 BBL	BP T2502	Produced Water
MT	Tank	135 g		Methanol
FS	Filter Skid			
Met	Fuel Gas Meter		90 - 6097 - 8	
Pit	Tank			Multiphase
Triplex	Triplex Pump			

Containment Volume Evaluation:
 Berm Size: 84'x60'x(20"-2" Rainfall)= 1346 BBL
 Deduction for 3 Tank Displacement= 90 BBL
 Net Berm Capacity= 1246 BBL
 110% Capacity of Largest Tank= 550 BBL
 1246>550 Berm Adequate

Rev	Description	Date	By

Layer Credits:
 Bureau of Land Management, Inc., HERR, Garmon, INCORPORATED & NCA, LLCs
 Spatial Reference:
 Name: GCS NAD83
 GCS: NAD 1983
 Datum: NAD 1983



SEELEY
OIL COMPANY



ECOPOINT, INC

McClean 2 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 313455
 Legal: 37N-19W-15 SWNE
 Lat/Long: 37.465446, -108.928372
 MONTEZUMA COUNTY COLORADO

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

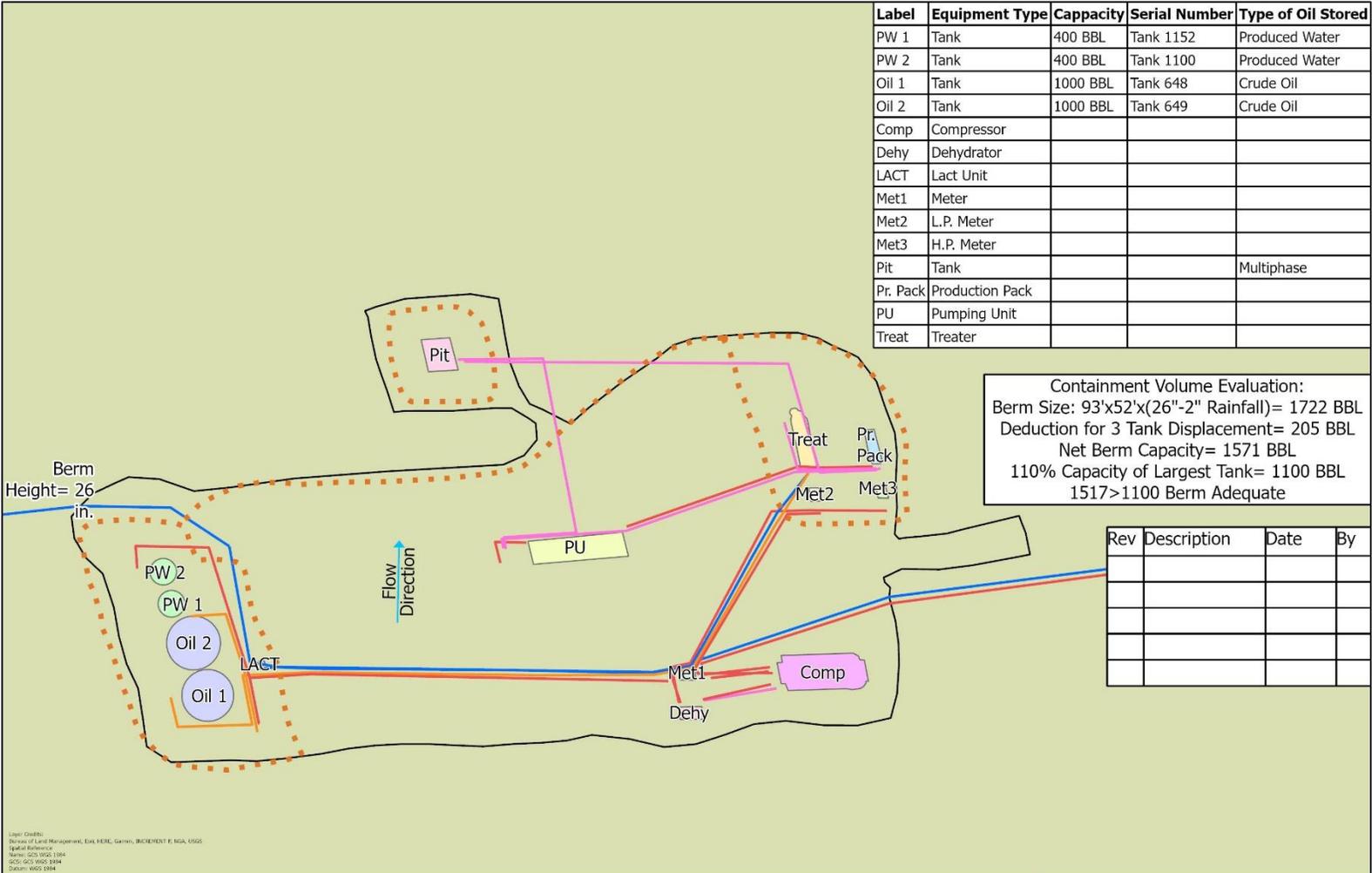
→ Water Flow Patterns
 ■ Berm
Flowlines
 — Natural Gas
 — Produced Water



Feet
 0 19.5 39 78

Date: 6/4/2021
 Author: Wes Collins





Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
PW 1	Tank	400 BBL	Tank 1152	Produced Water
PW 2	Tank	400 BBL	Tank 1100	Produced Water
Oil 1	Tank	1000 BBL	Tank 648	Crude Oil
Oil 2	Tank	1000 BBL	Tank 649	Crude Oil
Comp	Compressor			
Dehy	Dehydrator			
LACT	Lact Unit			
Met1	Meter			
Met2	L.P. Meter			
Met3	H.P. Meter			
Pit	Tank			Multiphase
Pr. Pack	Production Pack			
PU	Pumping Unit			
Treat	Treater			

Containment Volume Evaluation:
 Berm Size: 93'x52'x(26"-2" Rainfall)= 1722 BBL
 Deduction for 3 Tank Displacement= 205 BBL
 Net Berm Capacity= 1571 BBL
 110% Capacity of Largest Tank= 1100 BBL
 1517>1100 Berm Adequate

Rev	Description	Date	By

Sheet 024882
 Bureau of Land Management, Est. HERE, Garino, INCORPORATED P. MGA, USGS
 Spatial Reference
 NAD83, GCS NAD83, 1984
 Datum: GCS NAD83, 1984
 Datum: NAD83, 1984



SE Spargo SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 322118
 Legal: 38N-20W-1 SESE
 Lat/Long: 37.577983, -108.997365
 COUNTY COLORADO

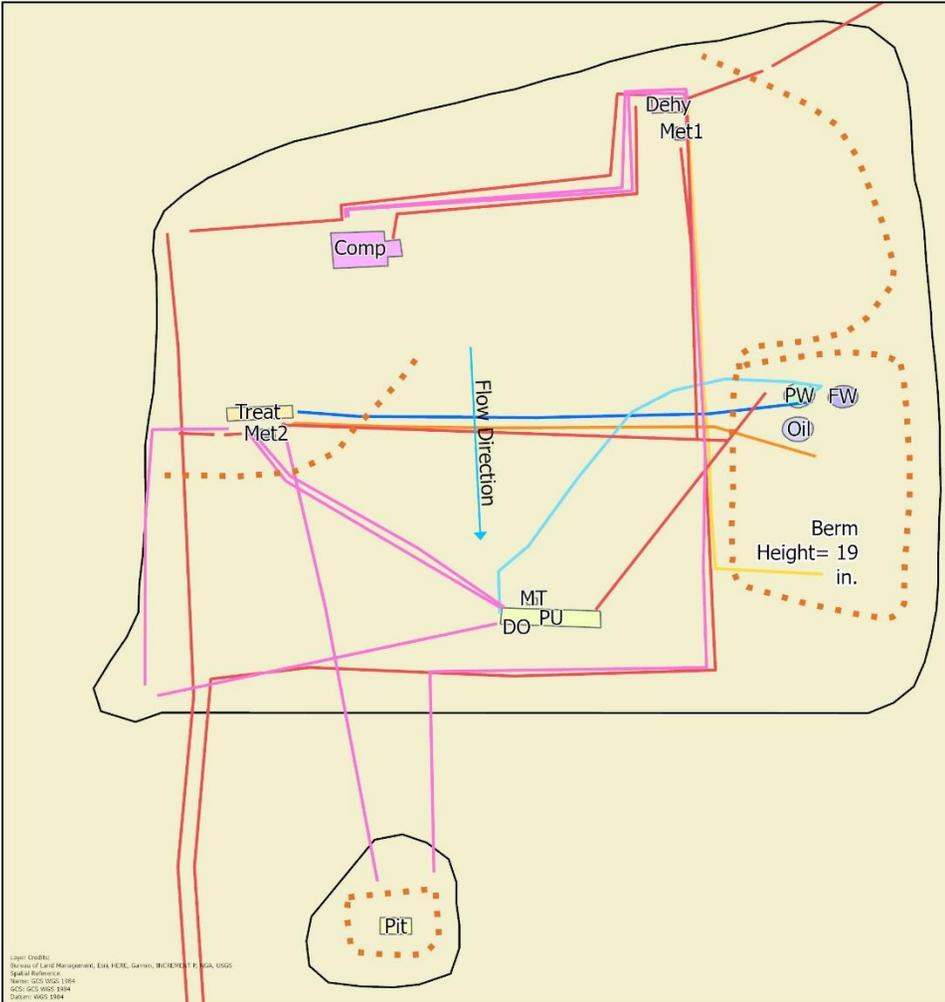
Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Multiphase
- Natural Gas
- Oil
- Produced Water

Feet
 0 18.75 37.5 75

Date: 6/3/2021
 Author: Wes Collins





LSPCC 026810
 Division of Land Management, Est. HERE, GARDEN, BUCKENST P. USA, 1950
 Legal Reference:
 Section: SEC 36-20-36
 NAD: NAD 83
 Datum: NAD 83

Label	Equipment Type	Capacity	Serial Number	Type of Oil Stored
FW	Tank	400 BBL		Fresh Water
Oil	Tank	400 BBL	130117A	Crude Oil
PW	Tank	400 BBL	ELT-9A14401-07	Produced Water
DO	Drill Oil	25 g		Drill Oil
MT	Tank	135 g		Methanol
Comp	Compressor			
Dehy	Dehydrator		10472	
Met1	Master Meter		18978.49	
Met2	Gas Meter			
Pit	Flare Pit			
PU	Pumping Unit			
Treat	Treater		ELT505170101	

Containment Volume Evaluation:
 Berm Size: 64'x107'x(19"-2" Rainfall)= 1931 BBL
 Deduction for 2 Tank Displacement= 70 BBL
 Net Berm Capacity= 1861 BBL
 110% Capacity of Largest Tank= 440 BBL
 1861>440 Berm Adequate

Rev	Description	Date	By



Spargo 1-36 SPCC Facility Diagram

Prepared For: Seeley Oil Company
 COGCC ID: 322109
 Legal: 39N-20W-36 SESW
 Lat/Long: 37.593063, -109.007306
 DOLORES COUNTY COLORADO

Disclaimer: Map is only intended to provide representation for navigation and orientation purposes.

- Water Flow Patterns
- Berm
- Flowlines**
- Condensate
- Fresh Water
- Multiphase
- Natural Gas
- Oil
- Produced Water

Feet
 0 19 38 76

Date: 6/3/2021
 Author: Wes Collins



Appendix E – Initial Hazardous Materials Spill Report

Initial Report
Hazardous Materials Spill/Release
Seeley Oil Company

Operations Manager: Verbally report incident immediately to management, then follow up with faxed or e-mailed report.

Date of Report: _____ Report Made By: _____

Time of Report: _____ AM / PM Phone Number: _____

Facility: _____

Township: _____ Range: _____ Section: _____ QtrQtr: _____

API#: _____ County: _____

Lease#: _____ State: _____

*Note: Include any maps or diagrams, as necessary.

Date of Event: _____

Operated by: Company Contractor (Circle One)

Material Discharged (Circle all that apply):

Crude Oil	Produced Water	Engine Oil	Other:
Engine Oil	Methanol	Used Oil	_____
Condensate	Glycol	Antifreeze	

Amount Discharged: _____ (est.) Direction of Flow _____

Amount Recovered: _____ (est.) Distance Traveled: _____



Circle all that apply to the situation:

On Land	Contained and Controlled	Within Facility Dike	Off-site
On Water	Uncontained and Uncontrolled	Within Facility, Out of Dike	

Name of Nearest Lake or Stream: _____

Distance to Nearest Lake or Stream: _____

All affected areas (including dry draws, washes, drainages):

Action taken for control and containment:

Action taken for cleanup:

Estimated time and cost for cleanup:

Apparent cause for discharge:

Number and type of injuries, if any:

Any damages resulting from release:

Weather conditions at incident location:

Other pertinent information:

Agency Notifications Made:

	National Response Center	BLM District Office	COGCC	Other State Agency (specify)	Federal Agency (specify)
Date:					
Time:					
Name of Contact:					
Phone:					
Report #:					

Agency special instructions/requests:

Supervisor _____ Date: _____



Field Technicians Log

LOCATION _____ DATE/ TIME: _____ PUMPER: _____

This is a dynamic document. It can be changed for improvements to safety and maintenance.

GENERAL LOCATION

Condition of access roads acceptable YES ___ NO ___ Entrance signage visible YES ___ NO ___

Any abnormal conditions to report YES ___ NO ___ Cattle Guards in place? YES ___ NO ___

Any large equipment (Pump/heater/loader etc.), vessel (frac tank etc.) present on the pad? YES ___ NO ___

Any site construction, drilling, completion (fracing/flow back/ landing tubing) or maintenance job ongoing? YES ___ NO ___

If any of the above in item 2 is ongoing, is pad/well secured for the operation? YES ___ NO ___

Is combustor lit? YES ___ NO ___ Ground settled/eroded YES ___ NO ___

Spills/Leaks/Stained Soil YES ___ NO ___ Trash/Debris YES ___ NO ___ Berm erosion YES ___ NO ___

Comments: _____

WELLHEAD

Well Head/ Valve Servicing Date Current YES ___ NO ___ Bradenhead Pressure, <125 psig? YES ___ NO ___

Cellar Covers YES ___ NO ___ Fencing YES ___ NO ___ Well signage in order? YES ___ NO ___

Liquids in cellar rings YES ___ NO ___ Telemetry Properly Secured YES ___ NO ___

Trash/Debris YES ___ NO ___ Leaks/ Spills/Stained Soil YES ___ NO ___

Master Valve handles installed YES ___ NO ___ Ground settled/eroded YES ___ NO ___

Well Identification YES ___ NO ___ Ratholes/ Mouseholes covered YES ___ NO ___

Comments: _____

SEPARATOR

IS/ are well/s flowing? YES ___ NO ___ Are Burners lit? YES ___ NO ___ Are building doors closed? YES ___ NO ___
 Are side doors open? YES ___ NO ___ Measured LEL? If yes, did detector go off? YES ___ NO ___
 Flow line blow down valves plugged YES ___ NO ___ Dump line blow down valves plugged YES ___ NO ___
 Blowdown line secured with locking device YES ___ NO ___ Combustor lit YES ___ NO ___
 Leaks/Spills/Stained Soil YES ___ NO ___ Signage YES ___ NO ___
 Ground settled/eroded YES ___ NO ___ Trash/Debris YES ___ NO ___
 Comments: _____

TANK BATTERY

Are all valve conditions OK? YES ___ NO ___ Is drip bucket available inside the containment ring? YES ___ NO ___
 Is tank level ok? YES ___ NO ___ Any sign of gas coming from the thief hatch? YES ___ NO ___
 Sales & Water Draw Valves secured with bull plugs YES ___ NO ___ Valves properly darged and sealed YES ___ NO ___
 Leaks/Spills/Stained Soil, Gravel YES ___ NO ___ Signage YES ___ NO ___
 Trash/Debris YES ___ NO ___ Ground settled/eroded YES ___ NO ___
 Standing water/oil YES ___ NO ___ Thief hatches closed YES ___ NO ___
 Liner damaged/leaking YES ___ NO ___ Stairs/Walkways/Tanks Clean YES ___ NO ___
 Comments: _____

WATER SKIDS

Ground settled/eroded YES ___ NO ___ Leaks/spills/stained soil YES ___ NO ___
 Water Skid in operation YES ___ NO ___ Water Skid Line Pressure _____ PSI
 Comments: _____



Annual SPCC Inspection Form

GENERAL INFORMATION			
Inspection Date:		Facility Name:	
Inspector Name:			
Equipment	Satisfactory	Unsatisfactory	Comments
1) Storage Tanks – Check shell, roof, valves, transfer pump/connections, hatches, seals, foundation/supports			
Drip marks			
Discoloration on tanks			
Puddles containing spilled or leaked material			
Corrosion			
Cracks			
2) Separation Equipment – check oil/water separator, pipes, valves, pressure regulators, supports			
Leaks			
Corrosion			
Condition of equipment			
Excess of oil in separator			
3) Flowlines – Check connections, valves, seals, supports			
Leaks			
Corrosion			
Condition of pipes			
Stained soil			
Bowing of pipe between supports			
Localized dead vegetation			
4) Well Heads – Check valves, connections, pumping units			
Leaks			
Corrosion			
Condition of equipment			
5) Heat Treater Equipment – Check piping, valves, pressure regulators, supports			
Leaks			
Corrosion			
Condition of equipment			
6) Secondary Containment – Check berm			
Level of precipitation in berm			
Presence of oil/water in berm			
Condition of berm walls			
Accumulation of debris			
Erosion of walls, floor, etc.			
Stained soil			
Weeds/vegetation			
7) Loading & Unloading Areas – Check connections, valves, flowlines			
Leaks			
Stained soil			
8) General Housekeeping – Check for overall organization, clean operations			
Overall facility condition			



Appendix G- Oil Spill Response Procedures

First Responder

Determine that an emergency condition exists, indicated by:

- a) Abnormal operating parameters
- b) Equipment malfunction or failure
- c) The release of liquids, vapors, natural gas, or H₂S
- d) Combustion, explosion, or fire

Notify Foreman (Initiate notification procedure)

Approach the scene with caution, evaluate for:

- a) Identify the leaking material and container.
- b) Need for Personal Protective Equipment (PPE)
- c) H₂S
- d) Lack of oxygen (confined space or gaseous atmosphere)
- e) Combustible/flammable atmosphere (fire/explosion potential)
- f) Electrical hazards

Put on any required PPE.

If potentially harmful levels of flammable vapors are gas are present:

- a) Evacuate the area immediately.
- b) Secure the site. Keep unauthorized personnel out.

If it is safe:

- a) Immediately stop any filling or transfer operations
- b) Eliminate ignition sources. (Turn off pilot lights, do not use telephones, do not start vehicles, shut off electricity if appropriate).
- c) Alert other personnel by sounding alarm, if appropriate.
- d) Attempt to shut-in the source or reduce the spill size by remotely closing the appropriate valve, reducing operating pressures, or rotating leaking container so the hole is above the liquid level.
- e) Assess the situation to the best of your ability for:
 - Specific material released.
 - Volume released.
 - Pressure reading(s)
 - Conditions- time, weather, climate, location (e.g., tank#)
 - History, if known
 - Potential losses – lives, property, environment
- f) Initiate containment, if possible

If unable to control the spill or leak, determine which direction the hazardous materials are moving.

Determine if company personnel and local residents need to be evacuated.

Secure the site. Keep unauthorized personnel out.

Notify the Foreman, or next available authority, and provide an update:

- a) Verification of the specific material released.
- b) Approximate volume (size) released.
- c) Potential losses – lives, property, environment
- d) Conditions – time, weather, climate, location (e.g. tank #)
- e) Direction of spill flow
- f) Pressure reading(s)
- g) History, if known

DO NOT enter any enclosed structure to isolate equipment without first putting on appropriate PPE and monitoring the atmosphere for physical and health hazards.

EVACUATION

- If the spill or leak is beyond the control capability of local Company personnel, evacuate the area.
- Evacuate UP-WIND when possible.
- Follow any posted evacuation routes to designated rendezvous points, if appropriate.
- Rendezvous at least 500 feet from the hazard area.

NOTE: Control rooms are not considered to be safe havens and should not be used as a rendezvous point.

The senior on-site Company employee will account for all Company personnel at the location.

DO NOT leave a rendezvous point without indicating your destination to the senior on-site employee.

Appendix H - COGCC Table 915-1

COGCC Table 915-1

CLEANUP CONCENTRATIONS

Contaminant of Concern	Concentrations
Soil TPH (total volatile [C ₆ -C ₁₀] and extractable [C ₁₀ -C ₃₆] hydrocarbons)	500mg/kg
Soils and Groundwater - liquid hydrocarbons including condensate and oil	below visual detection limits
Soil Suitability for Reclamation	
Electrical conductivity (EC) (by saturated paste method) ^{1,2}	<4mmhos/cm
Sodium adsorption ratio (SAR) (by saturated paste method) ^{1,2,3}	<6
pH (by saturated paste method) ^{1,2}	6-8.3
boron (hot water soluble soil extract) ^{1,2,3}	2mg/l
Organic Compounds in Groundwater ⁴	
benzene	5µg/l
toluene ⁵	560 to 1,000µg/l
ethylbenzene	700µg/l
xylenes (sum of o-, m- and p- isomers = total xylenes) ⁵	1,400 to 10,000µg/l
naphthalene	140µg/l
1,2,4-trimethylbenzene	67µg/l
1,3,5-trimethylbenzene	67µg/l
Groundwater Inorganic Parameters ⁴	
total dissolved solids (TDS) ¹	<1.25 X local background
chloride ion ¹	250mg/l or <1.25 X local background
sulfate ion ¹	250mg/l or <1.25 X local background

Table 915-1 (continued)

Contaminant of Concern Residential Soil Screening Level Concentrations (mg/kg) ⁷		Concentrations Protection of Groundwater Soil Screening Level Concentrations (mg/kg) Risk Based (R) and MCL Based (M) ^{7,8}
Organic Compounds in Soils^{6, 9, 10}		
benzene	1.2	0.0026 (M)
toluene	490	0.69 (M)
ethylbenzene	5.8	0.78 (M)
xylene (sum of o-, m- and p- isomers = total xylenes)	58	9.9 (M)
1,2,4-trimethylbenzene	30	0.0081 (R)
1,3,5-trimethylbenzene	27	0.0087 (R)
acenaphthene	360	0.55 (R)
anthracene	1800	5.8 (R)
benz(a)anthracene	1.1	0.011 (R)
benzo(b)fluoranthene	1.1	0.3 (R)
benzo(k)fluoranthene	11	2.9 (R)
benzo(a)pyrene	0.11	0.24 (M)
chrysene	110	9 (R)
dibenzo(a,h)anthracene	0.11	0.096 (R)
fluoranthene	240	8.9 (R)
fluorene	240	0.54 (R)
indeno(1,2,3-cd)pyrene	1.1	0.98 (R)
1-methylnaphthalene	18	0.006 (R)
2-methylnaphthalene	24	0.019 (R)
naphthalene	2	0.0038 (R)
pyrene	180	1.3 (R)
Metals in Soils^{1, 6, 9, 10, 11}		
arsenic	0.68	0.29 (M)
barium	15000	82 (M)
cadmium	71	0.38 (M)
chromium (VI)	0.3	0.00067 (R)
copper	3100	46 (M)
lead	400	14 (M)
nickel	1500	26 (R)
selenium	390	0.26 (M)
silver	390	0.8 (R)
zinc	23000	370 (R)

Footnotes for Table 915-1

¹ The Director will consider site-specific background concentrations or reference levels in native soils and Groundwater.

² Soil suitability thresholds for electrical conductivity (“EC”), pH, and sodium adsorption ratio (“SAR”) in soils are based on use of saturated paste preparation methods, followed by analysis. Soil suitability thresholds for available boron are based on hot water soluble (or DPTA/sorbitol) extraction followed by analysis. Methods for preparation and analysis of the soil suitability parameters can be found in Soil, Plant, and Water Reference Methods for the Western Region, as incorporated by reference in Rule 901.b.

³ With the Director’s prior approval, SAR levels and the concentration for hot water soluble boron may be modified based on land use, depth, or characteristics of the vegetative community.

⁴ Concentrations for Groundwater are taken from WQCC Regulation 41, as incorporated by reference in Rule 901.b.

⁵ For toluene and xylenes (total), the first number in the range is a strictly health-based value based on the WQCC’s established methodology for human health-based standards. The second number in the range is a maximum contaminant level (“MCL”), established under the federal Safe Drinking Water Act which has been determined to be an acceptable level of this Chemical in public water supplies, taking treatability and laboratory detection limits into account. The WQCC intends that control requirements for this Chemical be implemented to attain a level of ambient water quality that is at least equal to the first number in the range except as follows: 1) where Groundwater quality exceeds the first number in the range due to a Release of contaminants that occurred prior to September 14, 2004 (regardless of the date of discovery or subsequent migration of such contaminants), clean-up levels for the entire contaminant plume will be no more restrictive than the second number in the range or the Groundwater quality resulting from such Release, whichever is more protective; and 2) whenever the WQCC has adopted alternative, site-specific standards for the Chemical, the site-specific standards will apply instead of these statewide standards.

⁶ Concentrations for organic compounds and metals in soils are taken from the November 2020 EPA Regional Screening Levels (“EPA RSLs”) for Chemical Contaminants at Superfund Sites, as incorporated by reference in Rule 901.b.

⁷ If there is no pathway for communication with Groundwater, then residential soil screening levels apply for organic compounds and metals. If the Director determines that a pathway to Groundwater exists, then the protection of Groundwater soil screening levels will apply, secondary to actual measured concentrations of the contaminants of concern in Groundwater.

⁸ The letter “(R)” following a protection of Groundwater soil screening level indicates the concentration is derived from a risk-based approach. The letter “(M)” following a protection of Groundwater soil screening level indicates the concentration is derived from the drinking water MCL.

⁹ If the method detection limit (“MDL”) or practical quantitation limit (“PQL”) for a pollutant is higher (less stringent) than a threshold concentration listed in Table 915-1, the Director may allow an Operator to substitute the MDL or PQL for the concentration listed in Table 915-1.

¹⁰The risk based cleanup concentrations for organic compounds in soils shown in Table 915-1 are taken from the EPA RSLs, as incorporated by reference in Rule 901.b, tables for Target Risk (“TR”) = 1×10^{-6} and Target Hazard Quotient (“THQ”) = 0.1. The risk-based cleanup concentrations for metals in soils shown in Table 915-1 are taken from the EPA RSLs, as incorporated by reference in Rule 901.b, tables for TR = 1×10^{-6} and THQ = 1. The EPA RSL Frequently Asked Questions pages suggest that the THQ = 0.1 tables are appropriate when more than 1 compound of concern is to be considered as present or likely to be present as is typical in soils impacted with organic compounds in Spills or Releases of produced water or liquid hydrocarbons.

¹¹The Director will consider Residential Soil Screening Level Concentrations up to 1.25 times site specific background levels for metals in soil.

Appendix I - Table of Equipment at each Facility that has a reasonable potential for failure

Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
Well	Island Butte 1	South	Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
Well and Facility	Island Butte A	South	Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Recycle Treater	Crude Oil	Gradual		
			Oil Stabilizer	Crude Oil	Gradual		
			Treater	Multiphase	Gradual		
			Treater	Multiphase	Gradual		
			Treater	Multiphase	Gradual		
			Dehydrator	Multiphase	Gradual		
			Compressor	Natural Gas	Gradual		
			Tank	Motor Oil	Instantaneous	250 Gallons	Steel
			Flare Pit	Multiphase	Gradual		
Well Pad	Island Butte 3	East	Tank	Motor Oil	Instantaneous	250 Gallons	Steel
Well	Canyon 1	Southwest	Tank	Condensate	Instantaneous	400 BBLs	Steel
			Production Pack	Multiphase	Gradual		



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Tank	Multiphase	Instantaneous	21 BBLs	Steel
Well and Facility	SE Spargo	North	Tank	Crude Oil	Instantaneous	1000 BBLs	Steel
			Tank	Crude Oil	Instantaneous	1000 BBLs	Steel
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Dehydrator	Multiphase	Gradual		
			Compressor	Natural Gas	Gradual		
			Production Pack	Multiphase	Gradual		
			Treater	Multiphase	Gradual		
			Tank	Multiphase	Instantaneous		
			Lact Unit	Crude Oil	Gradual		
Injection	Spargo 2	Southwest	Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Tank	Motor Oil	Instantaneous	250 Gallons	Steel
			Tank	Methanol	Instantaneous	135 gallons	Poly
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Drill Oil	Drill Oil	Instantaneous	25 Gallons	



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Flare Pit	Multiphase	Instantaneous		
			Brine Filter	Produced Water	Gradual		
Well and Facility	Spargo 1-36	South	Compressor	Natural Gas	Gradual		
			Dehydrator	Multiphase	Gradual		
			Treater	Multiphase	Gradual		
			Drill Oil	Drill Oil	Instantaneous	25 Gallons	
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Produced Water	Instantaneous	400 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Flare Pit	Multiphase	Instantaneous		
Well	Island Butte 7-AH	West	Tank	Methanol	Instantaneous	135 Gallons	Poly
			Line Heater	Multiphase	Gradual		
Well	Island Butte 5	East	Line Heater	Multiphase	Gradual		
Well	Island Butte 8	South	Line Heater	Multiphase	Gradual		
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Drill Oil	Drill Oil	Instantaneous		
Well and Facility	Island Butte B	South	Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Oil LACT	Crude Oil	Gradual		
			Triplex Pump	Produced Water	Gradual		
			Brine Filter	Produced Water	Gradual		
			Separator	Multiphase	Gradual		
			Separator	Multiphase	Gradual		
			Separator	Multiphase	Gradual		
			Line Heater	Multiphase	Gradual		
			Line Heater	Multiphase	Gradual		
			Tank	Motor Oil	Instantaneous	250 Gallons	Steel
			Stabilizer Cooler	Crude Oil	Gradual		
			Flash Separator	Multiphase	Gradual		
			Compressor	Natural Gas	Gradual		
			Oil Stabilizer	Crude Oil	Gradual		
			Dehydrator	Multiphase	Gradual		
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Compressor	Natural Gas	Gradual		
Well	Cutthroat 8	East	Separator	Multiphase	Gradual		



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Tank	Multiphase	Instantaneous	45 BBLs	Steel
			Line Heater	Multiphase	Gradual		
Well	Cutthroat 14	North	Separator	Multiphase	Gradual		
			Flare Pit	Multiphase	Gradual	79 BBLs	
			Tank	Methanol	Instantaneous	135 Gallons	
			Tank	Methanol	Instantaneous	135 Gallons	
Well	Cutthroat 12	Northeast	Tank	Multiphase	Instantaneous	44 BBLs	Steel
			Line Heater	Multiphase	Gradual		
			Separator	Multiphase	Gradual		
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
Well and Facility	Cutthroat B	Southeast	Inlet Heater	Multiphase	Gradual		
			Free Water Knock Out	Multiphase	Gradual		
			Separator	Multiphase	Gradual		
			Tank	Propane	Instantaneous	1000 Gallons	Steel
			Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Lact Unit	Crude Oil	Gradual		
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Tank	Motor Oil	Instantaneous	250 Gallons	Steel
			Hot Oil Heater	Crude Oil	Gradual		
			Tank	Glycol	Instantaneous	300 Gallons	
			Reboiler		Gradual		



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Multiphase	Instantaneous		
			Tank	Crude Oil	Instantaneous	500 BBLs	Steel
			Tank	Crude Oil	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Filter Skid	Produced Water	Gradual		
			Reboiler Vent Tank	Multiphase	Gradual		
			NGL LACT	NGLs	Gradual		
			Oxidizer	Oxidizer	Gradual	180 Gallons	
			Drill Oil	Drill Oil	Instantaneous	35 Gallons	
Well	Cutthroat 3	East	Separator W/ Gas Meter	Multiphase	Gradual		
			Tank	Multiphase	Instantaneous	21 BBLs	Steel
Well	McClellan 2	West	Triplex Pump	Produced Water	Gradual		
			Filter Skid	Produced Water	Gradual		
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Produced Water	Instantaneous	400 BBLs	Fiberglass
			Tank	Produced Water	Instantaneous	400 BBLs	Fiberglass



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Tank	Produced Water	Instantaneous	400 BBLs	Fiberglass
			Tank	Produced Water	Instantaneous	400 BBLs	Fiberglass
			Tank	Multiphase	Instantaneous		
Facility	Cutthroat A	East	Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Tank	NGLs	Instantaneous	30,000 Gallons	Steel
			Tank	Motor Oil	Instantaneous	250 Gallons	Steel
			Tank	Propane	Instantaneous	1000 Gallons	Steel
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Tank	Methanol	Instantaneous	135 Gallons	Poly
			Inlet Heater	Multiphase	Gradual		
			Separator	Multiphase	Gradual		
			Compressor	Natural Gas	Gradual		
			Compressor	Natural Gas	Gradual		
			Tank	Propane	Instantaneous	1000 Gallons	Steel
			Chiller Skid	Crude Oil	Gradual		
			Residue Cooler	Multiphase	Gradual		
			Propane Condensor	Propane	Gradual		
			Propane Cooler	Propane	Gradual		
			Tank	Propane	Instantaneous	1000 Gallons	Steel



Disturbance Type	Name	Direction of Off-Site Flow	Equipment Type	Material Stored	Rate of Release	Total quantity that could be released as a result of a failure	Construction Material
			Propane Condenser	Propane	Gradual		
			Oil Cooler	Crude Oil	Gradual		
			Hot Oil Heater	Crude Oil	Gradual		
			Tank	Crude Oil	Instantaneous	1000 BBLs	Steel
			Tank	Crude Oil	Instantaneous	1000 BBLs	Steel
			Tank	Produced Water	Instantaneous	500 BBLs	Steel
			Flare Pit	Multiphase	Instantaneous		
			Drill Oil	Drill Oil	Instantaneous	35 Gallons	
			NGL LACT	NGLs	Gradual		
Well	Cutthroat 4	Northeast	Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Tank	Crude Oil	Instantaneous	400 BBLs	Steel
			Line Heater	Glycol/Multi	Gradual		
Well	Cutthroat 9	West	Line Heater	Glycol/Multi	Gradual		



Appendix J - Discharge Prevention Training Outline and Training Log
Discharge Prevention Log

Date: _____

Attendees: _____

Subject/Issue Identified	Required Action	_____ Implementation Date
_____	_____	_____
_____	_____	_____
_____	_____	_____
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