



Fwd: Clem 15-13 (PB 15) Spill Doc - 1631775 Closure Request

Araza - DNR, Steven <steven.arauza@state.co.us>

To: Alex Fischer - DNR <alex.fischer@state.co.us>, Jim Hughes - DNR <jimo.hughes@state.co.us>

Caerus Spill #1631775

Steven J. Araza, P.G.
Environmental Protection Specialist



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

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He/Him

----- Forwarded message -----

From: **Blair Rollins** <brollins@caerusoilandgas.com>

Date: Thu, Apr 8, 2021 at 2:06 PM

Subject: RE: Clem 15-13 (PB 15) Spill Doc - 1631775 Closure Request

To: Araza - DNR, Steven <steven.arauza@state.co.us>

Steven,

During excavation and investigation activities associated with REM #14938 on the PB15 well pad, the eastern tanks were moved to the west portion of the containment temporarily and the se under approximately 35 – 45 percent of the secondary containment was excavated and soils were characterized during the time of the investigation. Clearance samples were collected under COGCC Table 910-1 standards. All impacted soil found below the secondary containment was at depth due to the release associated with REM #14938, and not associated with COGCC Sp

During the excavation, gravel was removed from the secondary containment and liner assessment below the tanks and on the eastern half of the containment was conducted. No holes or tei

Since the December 25, 2009 release, the COGCC has conducted and documented eleven (11) site inspections at the location. Eight (8) inspections were completed between 05/07/2013 and associated with the tank battery containment. A Corrective Action was issued during an inspection on 12/20/2019 (Document # 668100111) to repair pin holes within the liner sidewall and line containment. No staining or sheen were identified during this inspection. This Corrective action was completed on 01/24/2020 and the associated FIR Resolution Form (Document #40229657 subsequent inspections completed on 01/10/2020 and 04/28/2020 did not comment on the Corrective Action, nor did they identify any deficiencies or staining associated with the tank battery COGIS database using COGCC Location ID 334653.

Based on the initial response of the release, assessment below the eastern half of the secondary containment during REM 14938 investigation, and the series of documented inspections outl incident and should be closed.

Any additional investigation of the release does not seem reasonable or necessary based on the fact that sampling of the area will be conducted during the required COGCC Rule 911.a.(4) si reclamation.

Please let me know if you agree with Caerus' assessment and approach to administratively close the spill within the secondary containment which occurred in 2009.

Thank you,

Blair Rollins

Environmental Specialist

Caerus Oil and Gas LLC

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From: Araza - DNR, Steven <steven.arauza@state.co.us>

Sent: Friday, April 2, 2021 9:45 AM

To: Blair Rollins <brollins@caerusoilandgas.com>

Subject: Re: Clem 15-13 (PB 15) Spill Doc - 1631775 Closure Request

Blair,

Have you revisited this Spill? I don't see any response to my previous email.

Steven J. Arauza, P.G.
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On Wed, Feb 12, 2020 at 10:11 AM Arauza - DNR, Steven <steven.arauza@state.co.us> wrote:

Blair, did this historical spill occur at the same tank battery that had the PB-15 Dumpline Failure (Spill/Release ID #470298)?

Assuming that the historical spill and the recent one occurred in the same battery, it may be possible to tie the historical spill to ongoing Remediation Project #14938, IF soil underlying the tank could provide a means to document Table 910-1 compliance for the potentially-impacted area.

Let me know what you think.

Steven J. Arauza, P.G.
Environmental Protection Specialist

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On Tue, Feb 11, 2020 at 1:03 PM Blair Rollins <brollins@caerusoilandgas.com> wrote:

Steven,

Upon review of COGCC spill document # 1631775 the following information was identified:

- 20bbl of produced water and 1 bbl of oil was released into secondary containment;
- 21 bbl was recovered immediately from the secondary containment.

At this time Caerus is requesting NFA and closure of Spill Doc 1631775.

Location	COGCC Location ID	Field - Route	Remediation Type: (briefly describe the E&P material)	Facility/Spill ID	Form 19 Submittal Date	Historic Spill DOC# relating	BBL Lost	Notes
Clem 15-13 (PB 15)	334653	PARACHUTE	SPILL	045-09558	12/28/2009	1631775	21	21bbl PW - 21bbl reco

Please let me know if you have any questions regarding the provided information.

Thank you,

Blair Rollins

Environmental Specialist

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Figure 1 PB15 Sample Location Map_402315776.pdf
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