



Fwd: Caerus Historic Project Inquiry – COGCC Document #1981063 P23B

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

Fri, Dec 17, 2021 at 1:40 PM

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

Caerus Spill #1981063

Steven J. Arauza, 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: Fri, Mar 26, 2021 at 7:17 AM

Subject: Caerus Historic Project Inquiry – COGCC Document #1981063 P23B

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

Cc: Brett Middleton <bmiddleton@caerusoilandgas.com>

Steven,

I have prepared this email to provide you with an update and request guidance concerning a historical spill project that needs to be addressed for closure. The project is associated with the P23B Well Pad (COGCC Location ID 335320) and the attached Form 19 Document # 1981063.

The 26-barrel (bbl) condensate release occurred on 8/14/2007 when a tank gauge failed causing a tank to overfill. All fluids were contained within the tank battery's lined secondary containment and all free liquids were recovered by a water truck shortly after the release. No samples associated with this release were collected. Since the release, the COGCC has conducted and documented eleven (11) site inspections at the location. These inspections document numbers are as follows:

- 1 – 663800589
- 2 – 670201166
- 3 – 666800159
- 4 – 666800874
- 5 – 666801580

6 – 666802347
7 – 666803412
8 – 689302811
9 – 694900897
10 – 700701667
11 – 692402890

None of the inspections note deficiencies associated with the tank battery containment. A Corrective Action was issued during an inspection on 11/16/2012 (Document # 663800589) to clean up fluids and stains within the tank battery secondary containment. A subsequent inspection completed on 01/17/2014, as well as nine (9) inspections completed since, documented adequate maintenance of the secondary containment with no staining or housekeeping concerns noted. All inspections can be found in the COGIS database using COGCC Location ID 335320.

Based on the initial response to the release and the series of documented COGCC inspections, this spill was successfully remediated and should be closed. Caerus proposes to defer sample analysis within the tank battery containment until the required COGCC Rule 911.a.(4) site investigation during facility decommissioning and final reclamation.

Please let me know if you agree with Caerus' assessment and approach to administratively close the spill within secondary containment which occurred in 2007.

Thank you,

Blair Rollins

Environmental Specialist

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