

## State of Colorado

## Energy &amp; Carbon Management Commission

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Document Number:

403848277

Date Received:

07/09/2024

Spill report taken by:

Kosola, Jason

Spill/Release Point ID:

486163

## SPILL/RELEASE REPORT (SUPPLEMENTAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to ECMC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

## OPERATOR INFORMATION

Name of Operator: <u>SIMCOE LLC</u>	Operator No: <u>10749</u>	<b>Phone Numbers</b>
Address: <u>1199 MAIN AVE SUITE 101</u>		Phone: <u>(970) 764 7356</u>
City: <u>DURANGO</u>	State: <u>CO</u>	Zip: <u>81301</u>
Contact Person: <u>Kyle Siesser</u>		Mobile: <u>( )</u>
		Email: <u>kssiesser@cottonwoodc osnulting.com</u>

☐ Transfer of Operatorship: Pursuant to Rule 912.f, this Supplemental Form 19 is being submitted to designate the Buying Operator as the responsible Operator for this Spill and Release.

## INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 403697564

Initial Report Date: <u>02/24/2024</u>	Date of Discovery: <u>02/23/2024</u>	Spill Type: <u>Recent Spill</u>
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**Spill/Release Point Location:**QTRQTR SESW SEC 25 TWP 34N RNG 9W MERIDIAN MLatitude: 37.155550 Longitude: -107.778626Municipality (if within municipal boundaries): \_\_\_\_\_ County: LA PLATA

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

☐ Check this box if this spill/release is related to a loss of integrity of a flowline, pipeline, crude oil transfer line, or produced water transfer line.

**Reference Location:**Facility Type: GAS PROCESSING PLANT☒ Facility/Location ID No 120172Spill/Release Point Name: Florida River Gas Plant  
Cooler☐ Well API No. (Only if the reference facility is well) 05- -☐ No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): 0Estimated Condensate Spill Volume(bbl): 0Estimated Flow Back Fluid Spill Volume(bbl): 0Estimated Produced Water Spill Volume(bbl): 0Estimated Other E&P Waste Spill Volume(bbl): >=1 and <5Estimated Drilling Fluid Spill Volume(bbl): 0Specify: Amine fluidHas the subject Spill/Release been controlled at the time of reporting? Yes

**Land Use:**

Current Land Use: OTHER

Other(Specify): Gas Processing Plant

Weather Condition: 50 F sunny

Surface Owner: FEE

Other(Specify): Simoce LLC land

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

On February 23, 2024, a release was discovered at the Florida Plant, operated by IKAV Energy, Simcoe LLC. The point of release was lat/long 37.155550, -107.778626. A broken inlet or outlet valve on a cooler caused approximately 2 BBLs of amine fluid to be misted over an area measuring approximately 16,000 ft<sup>2</sup>. The released amine fluid had already been in contact with gas as part of the treatment process at the time of the release. The valve was shut and the cooler was isolated to stop the release. Approximately 0.5 BBLs were recovered. All released fluids stayed within the gravel pad of the plant and no surface water or public water systems were threatened. The valve has been replaced. The area was treated with SA1000 and Soil Rx on February 24, 2024, and subsequent soil samples were collected.

**List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):**

**OTHER NOTIFICATIONS**

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
2/24/2024	Simcoe LLC (landowner)	Kholeton Sanchez	-	Responded to release
2/24/2024	ECMC	Jason Kosola	-	email
2/24/2024	CPW	Brian Magee	-	email
2/24/2024	La Plata County	Shawna Legarza	-	email

**REPORT CRITERIA**

**Rule 912.b.(1) Report to the Director (select all criteria that apply):**

No Rule 912.b.(1).A: 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.

Waters of the State: \_\_\_\_\_

Public Water System: \_\_\_\_\_

Residence or Occupied Structure: \_\_\_\_\_

Livestock: \_\_\_\_\_

Wildlife: \_\_\_\_\_

Publicly-Maintained Road: \_\_\_\_\_

Yes Rule 912.b.(1).B: 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.

No Rule 912.b.(1).C: 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.

No Rule 912.b.(1).D: 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

Enter the approximate time of discovery \_\_\_\_\_ (HH:MM)

Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 \_\_\_\_\_

Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? \_\_\_\_\_

Enter the Document Number of the Initial Accident Report, Form 22 \_\_\_\_\_

Was there damage during excavation? \_\_\_\_\_

Was CO 811 notified prior to excavation? \_\_\_\_\_

No Rule 912.b.(1).E: 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.

Estimated Volume of Impacted Solids (cu. yd.): \_\_\_\_\_

No	Rule 912.b.(1).F: 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. Check all that apply:  <input type="checkbox"/> The presence of free product or hydrocarbon sheen Surface Water <input type="checkbox"/> The presence of free product or hydrocarbon sheen on Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Groundwater <input type="checkbox"/> The presence of contaminated soil in contact with Surface water
No	Rule 912.b.(1).G: 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 daylight's from the subsurface.
No	Rule 912.b.(1).H: 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.  <input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

## SPILL/RELEASE DETAIL REPORTS

#1	Supplemental Report Date: 07/09/2024		
<b>FLUIDS</b>	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	0	0	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	2	1	<input type="checkbox"/>
specify: Amine fluid			
Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO			
Secondary containment, <b>including walls &amp; floor regardless of construction material</b> , must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.			
<b>A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit</b>			
Impacted Media (Check all that apply) <input checked="" type="checkbox"/> Soil <input type="checkbox"/> Groundwater <input type="checkbox"/> Surface Water <input type="checkbox"/> Dry Drainage Feature			
Surface Area Impacted: Length of Impact (feet): 140		Width of Impact (feet): 120	
Depth of Impact (feet BGS):		Depth of Impact (inches BGS):	
How was extent determined?			
Lateral and vertical extent determined by visual observation.			
Soil/Geology Description:			
Falfa clay loam, 3 to 8 percent slopes. Imported gravel overlies native soils.			
Depth to Groundwater (feet BGS) 84		Number Water Wells within 1/2 mile radius: 5	
If less than 1 mile, distance in feet to nearest		Water Well 1993 None <input type="checkbox"/>	Surface Water 970 None <input type="checkbox"/>
		Wetlands 970 None <input type="checkbox"/>	Springs None <input checked="" type="checkbox"/>
		Livestock None <input checked="" type="checkbox"/>	Occupied Building 2400 None <input type="checkbox"/>
Additional Spill Details Not Provided Above:			

The release area was treated with SA1000 and Soil Rx on February 24, 2024. Cottonwood consulting was onsite March 27, 2024, to conduct soil sampling following treatment of the release area. Two soil samples were collected from the treated area. Soil samples collected from the treated area were analyzed for ECMC Table 915 constituents. Three background soil samples were collected from the surrounding area to determine background concentrations. A soil sampling table and soil sample location map is provided in the attachments.

#2 Supplemental Report Date: 03/04/2024

FLUIDS	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	0	0	<input type="checkbox"/>
CONDENSATE	0	0	<input type="checkbox"/>
PRODUCED WATER	0	0	<input type="checkbox"/>
DRILLING FLUID	0	0	<input type="checkbox"/>
FLOW BACK FLUID	0	0	<input type="checkbox"/>
OTHER E&P WASTE	0	0	<input type="checkbox"/>

specify: Amine Fluid

Was spill/release completely contained within berms or secondary containment? NO Was an Emergency Pit constructed? NO

Secondary containment, **including walls & floor regardless of construction material**, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.

**A Form 15 Pit Report shall be submitted within 30 calendar days after the construction of an emergency pit**

Impacted Media (Check all that apply) ☒ Soil ☐ Groundwater ☐ Surface Water ☐ Dry Drainage Feature

Surface Area Impacted: Length of Impact (feet): 140 Width of Impact (feet): 120

Depth of Impact (feet BGS): Depth of Impact (inches BGS):

How was extent determined?

Lateral and vertical extent determined by visual observation.

Soil/Geology Description:

Falfa clay loam, 3 to 8 percent slopes. Imported gravel overlies native soils.

Depth to Groundwater (feet BGS) 84 Number Water Wells within 1/2 mile radius: 5

If less than 1 mile, distance in feet to nearest

Water Well	1993	None <input type="checkbox"/>	Surface Water	970	None <input type="checkbox"/>
Wetlands	970	None <input type="checkbox"/>	Springs		None <input checked="" type="checkbox"/>
Livestock		None <input checked="" type="checkbox"/>	Occupied Building	2400	None <input type="checkbox"/>

Additional Spill Details Not Provided Above:

Depth to water based on completion data from DWR water well permit, located approximately 80 feet lower in elevation than the release point.

## CORRECTIVE ACTIONS

#1	Supplemental Report Date: 03/04/2024
Root Cause of Spill/Release <u>Corrosion</u>	
Other (specify) _____	
Type of Equipment at Point of Spill/Release: <u>Other</u>	
If "Other" selected above, specify or describe here:	
Inlet/outlet valve into cooler bank.	
Describe Incident & Root Cause (include specific equipment and point of failure)	
Operations determined the South bank of the lean amine cooler had leaking plugs in need of repair. Operations isolated the bank and drained it to the amine sump. It was repaired by plant maintenance 2 days later. After the repair was completed, the operations team closed and removed the drain, closed the vent on the west end of the cooler bank, leaving the east end vent open to purge. The isolation valves were unlocked and left closed while the operations team went for parts in order to contain the purged liquid amine. During the time operations was off site, a corroded inlet/outlet valve into the cooler bank lost integrity and leaked, causing ~2 BBLS of amine solution to be misted from the vent on the east end of the cooler and reach the ground. The valve was shut and the cooler was isolated to stop the release.	
Describe measures taken to prevent the problem(s) from reoccurring:	
The inlet/outlet valve has been replaced. The RCFA/Investigative team will pressure test each bank of the cooler to identify if there are leaking inlet/outlet valves. Simcoe may use a FLIR on isolated banks of the cooler to possibly identify leaks thermally.	
Volume of Soil Excavated (cubic yards): _____	
Disposition of Excavated Soil (attach documentation) <input checked="" type="checkbox"/> Offsite Disposal <input type="checkbox"/> Onsite Treatment	
<input type="checkbox"/> Other (specify) _____	
Volume of Impacted Ground Water Removed (bbls): _____	
Volume of Impacted Surface Water Removed (bbls): _____	

## REQUEST FOR CLOSURE

**Spill/Release Reports should be closed when impacts have been remediated or when further investigation and corrective actions will take place under an approved Form 27.**

- Basis for Closure:
- ☒ Corrective Actions Completed (documentation attached, check all that apply)
    - ☐ Horizontal and Vertical extents of impacts have been delineated.
    - ☒ Documentation of compliance with Table 915-1 is attached.
    - ☒ All E&P Waste has been properly treated or disposed.
    - ☐ Work proceeding under an approved Form 27 (Rule 912.c).
      - Form 27 Remediation Project No: \_\_\_\_\_
    - ☐ SUSPECTED Spill/Release did not occur or was below Rule 912.a.(5) reporting thresholds.

### OPERATOR COMMENTS:

On February 23, 2024, a release was discovered at the Florida Plant, operated by IKAV Energy, Simcoe LLC. A corroded inlet/outlet valve on a amine cooler caused approximately 2 BBLs of amine fluid to be released over an estimated 16,000 ft2 area.

The release area was treated with SA1000 and Soil Rx on February 24, 2024. Cottonwood Consulting was onsite March 27, 2024, to conduct soil sampling following treatment of the release area. Two soil samples were collected from the treated area. Soil samples collected from the treated area were analyzed for ECMC Table 915 constituents. Three background soil samples were collected from the surrounding area to determine background concentrations.

Soil sample results did not indicate any analytes over Table 915 standards with the exception of elevated arsenic which was consistent with background concentrations. It appears that the treatment was successful, and the release area has been remediated. Given that all analytes were below ECMC Table 915 standards in soil samples collected, Simcoe respectfully requests closure of this site.

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

Signed: \_\_\_\_\_ Print Name: Kyle Siesser

Title: Consultant Date: 07/09/2024 Email: ksiesser@cottonwoodcosnulting.com

**COA Type**

**Description**

0 COA	

**ATTACHMENT LIST**

**Att Doc Num**

**Name**

403848339	ANALYTICAL RESULTS
403848340	ANALYTICAL RESULTS
403848341	SOIL SAMPLE LOCATION MAP
403848342	PHOTO DOCUMENTATION

Total Attach: 4 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
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Total: 0 comment(s)