

State of Colorado  
Energy & Carbon Management Commission

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Document Number:

404092612

Date Received:

02/28/2025

Spill report taken by:

Sanchez, Chris

Spill/Release Point ID:

489244

**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: CITATION OIL & GAS CORP	Operator No: 17180	<b>Phone Numbers</b>
Address: 14077 CUTTEN RD		Phone: (281) 891-1550
City: HOUSTON State: TX Zip: 77069		Mobile: (713) 702-7534
Contact Person: Bob Redweik		Email: bredweik@cogc.com

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# 404083404

Initial Report Date: 02/05/2025 Date of Discovery: 01/29/2025 Spill Type: Historical Release

**Spill/Release Point Location:**

QTRQTR CNE SEC 35 TWP 13S RNG 48W MERIDIAN 6

Latitude: 38.876942 Longitude: -102.748722

Municipality (if within municipal boundaries): County: CHEYENNE

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 255968  
 Spill/Release Point Name: MPU Pressure Maint Facility - Tank  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): Unknown	Estimated Condensate Spill Volume(bbl): 0
Estimated Flow Back Fluid Spill Volume(bbl): 0	Estimated Produced Water Spill Volume(bbl): 0
Estimated Other E&P Waste Spill Volume(bbl): Unknown	Estimated Drilling Fluid Spill Volume(bbl): 0

Specify: \_\_\_\_\_

Has the subject Spill/Release been controlled at the time of reporting? Yes

**Land Use:**

Current Land Use: NON-CROP LAND

Other(Specify): Rangeland grazing

Weather Condition: 45 F Wind 25 MPH W

Surface Owner: FEE

Other(Specify): \_\_\_\_\_

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

The spill was identified during an ECMC Flowline Inspection Report #701104136, inspected on 1/29/2025, and submitted on 1/31/2025. There was oil-staining at the base of a tank just outside compressor building. There is also surface staining below directly adjacent aboveground flowlines. The site is currently being delineated by soil screening with a PID and excavation.

**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>
2/5/2025	ECMC	Chris Sanchez	720-737-0406	Phone discussion
2/5/2025	Cheyenne County	Marcy Bossman	719-767-5872	Left voice message

**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: \_\_\_\_\_

No 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:

The presence of free product or hydrocarbon sheen Surface Water

The presence of free product or hydrocarbon sheen on Groundwater

The presence of contaminated soil in contact with Groundwater

The presence of contaminated soil in contact with Surface water

Yes	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 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: <u>02/28/2025</u>		
<b>FLUIDS</b>	BBL's SPILLED	BBL's RECOVERED	Unknown
OIL	_____	_____	<input checked="" type="checkbox"/>
CONDENSATE	_____	_____	<input checked="" type="checkbox"/>
PRODUCED WATER	_____	_____	<input checked="" type="checkbox"/>
DRILLING FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
FLOW BACK FLUID	<u>0</u>	<u>0</u>	<input type="checkbox"/>
OTHER E&P WASTE	<u>0</u>	<u>0</u>	<input type="checkbox"/>
specify: _____			
Was spill/release completely contained within berms or secondary containment? <u>NO</u> Was an Emergency Pit constructed? <u>NO</u>			
<i>Secondary containment, including walls &amp; floor regardless of construction material, must be sufficiently impervious to contain any discharge from primary containment until cleanup occurs.</i>			
<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): <u>25</u>		Width of Impact (feet): <u>20</u>	
Depth of Impact (feet BGS): _____		Depth of Impact (inches BGS): _____	
How was extent determined?			
The horizontal extent of impacts was determined via observations of surface soil staining. Further evaluation of impacts was determined by horizontal and vertical delineation via in field soil screening using a photoionization device (PID) during excavation and confirmation soil sampling.			
Soil/Geology Description:			
There is road base material on the pad surface down to ~ 1 feet BGS. Below that, according to the USDA Natural Resources Conservation Soil Survey, the spill area is made up of Olnest-Manzanst complex. The native composition of this soil type is:  Symbol 33 (100% of area) Ap - 0 to 4 inches: sandy loam BA - 4 to 6 inches: sandy clay loam Bt1 - 6 to 14 inches: sandy clay loam Bt2 - 14 to 18 inches: sandy clay loam Bk1 - 18 to 23 inches: sandy loam Bk2 - 23 to 79 inches: sandy loam			
Depth to Groundwater (feet BGS) <u>12</u>		Number Water Wells within 1/2 mile radius: <u>2</u>	
If less than 1 mile, distance in feet to nearest	Water Well <u>1862</u> None <input type="checkbox"/>	Surface Water <u>1000</u> None <input type="checkbox"/>	
	Wetlands _____ None <input checked="" type="checkbox"/>	Springs _____ None <input checked="" type="checkbox"/>	
	Livestock <u>180</u> None <input type="checkbox"/>	Occupied Building <u>3477</u> None <input type="checkbox"/>	
Additional Spill Details Not Provided Above:			

According to the closest DWR constructed water well record in proximity to the location (Permit UP10534 ~ 0.44 miles to the south) with data available the static water elevation is 12 feet BGS. There appears to be an occupied building ~0.65 miles west of the site. The location is 0.72 miles from CPW Aquatic Native Species Conservation Waters and within Lesser Prairie Chicken Estimated Occupied Range and Connectivity Area.

## CORRECTIVE ACTIONS

#1 Supplemental Report Date: 02/28/2025

Root Cause of Spill/Release Equipment Failure

Other (specify) \_\_\_\_\_

Type of Equipment at Point of Spill/Release: Other

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

Tank, Aboveground flowlines

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

This incident is the result of aging production equipment with prolonged exposure to extreme weather conditions and lack of maintenance, leading to insufficient integrity and failure. At this location equipment was not being maintained resulting in a slow leak at the compressor building tank and below aboveground flow lines. Production operations had inadequate best management practices and necessary resources established to complete routine inspections and internal reporting/response to spills.

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

New procedures have been developed and implemented to complete routine inspections and reporting for locations field wide. Citation will be instituting a good-housekeeping action item priority list and maintenance schedule to address issues before they occur and begin replacing aging equipment as possible. Failed equipment is being replacement with more resistant alternatives in consideration of best engineering practices for longevity and site conditions.

Volume of Soil Excavated (cubic yards): \_\_\_\_\_

Disposition of Excavated Soil (attach documentation)  Offsite Disposal  Onsite Treatment  
 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:

Citation initiated delineation of the horizontal and vertical extent of impacts on 2/6/2025 through excavation, soil screening with a PID and collection of confirmation soil samples. Remediation is currently ongoing. Confirmation samples are being collected to adequately demonstrate removal of impacts and analyzed for Table 915-1 constituents. Citation will submit a Form 19 supplemental report (90 day) including the following supportive documentation: figure displaying impacted area/depth and sample locations; summary of field observations, soil screening and laboratory analytical results; and waste disposal documentation.

Note that this facility is not a Gas Plant, but rather a Pressure Maintenance Facility. Applicable paperwork has been filed with the ECMC; however, the classification and name change are pending approval.

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

Signed: \_\_\_\_\_ Print Name: Joel Mason

Title: Agent Date: 02/28/2025 Email: joel.mason@absarokasolutions.com

<b>COA Type</b>	<b>Description</b>
	Per Rule 912.d.(3), Operator is to provide the root cause of the incident and preventative measures that will be taken to prevent reoccurrence on this site on the next Form 19 Supplemental. Please give the location of the failure and provide additional information at what point the failure occurred (i.e. 6 O'clock position) and if the root cause is corrosion explain if it is external or internal. In addition, The Operator shall provide photographic evidence of the point of failure and repairs made to the gathering system.
	The Operator did not provide Photo Documentation for the impacted areas. Operator shall provide photo documentation in the next Supplemental Form 19 submittal.
	If groundwater is encountered, the Operator shall sample for Inorganic Parameters (total dissolved solids, sulfate, chloride) in addition to the Organic Compounds
	Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).  The impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling.
	ECMC noted Spill Coordinates for Spill ID 489244 and Spill ID 489245 are identical. The Operator shall update the spill coordinates to reflect the exact location of the Release/Spill.
5 COAs	

**ATTACHMENT LIST**

<b>Att Doc Num</b>	<b>Name</b>
404092612	SPILL/RELEASE REPORT(SUPPLEMENTAL)
404111859	SITE MAP
404121659	FORM 19 SUBMITTED

Total Attach: 3 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
		Stamp Upon Approval

Total: 0 comment(s)