



A10E historic spill (Doc # 2214684)

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Thu, Jan 27, 2022 at 2:16 PM

To: Jim Hughes - DNR <jimo.hughes@state.co.us>

Cc: Brett Middleton <bmiddleton@caerusoilandgas.com>, "Arauzo - DNR, Steven" <steven.arauza@state.co.us>

Jim – thanks for taking time to close the K26 596 historic spill.

Here is another one from the A10E well pad (COGCC Location ID 421392) and the attached Form 19 Document # 2214684, which predates the eForms process.

The incident is described as a 50 barrel produced water spill which occurred when two open valves were left unattended on June 28, 2011. The spill was immediately identified, the pumps were shut down, and a vac truck was able to recover 40 barrels of spilled fluids. The spill location is found within the interim reclamation area found on the southeast corner of the well pad. Typically, during interim reclamation activities, gravel and soil from the active working surface would be stockpiled on location to be incorporated into the new working surface or reused at another location. Thus, due to the spill occurring within the interim reclamation area, it is assumed that any impacted soil and gravel not cleaned during initial response actions, would be incorporated into the active working surface or reused on another location. Since the release, the COGCC has conducted 10 inspections on the location as outlined below:

No.	Inspection Doc #	Date	Corrective Actions
1.	659700055	1/24/2012	None
2.	668100025	3/19/2012	(2) Tank signage, inadequate stormwater pond size
3.	663800505	9/20/2012	(1) Poor berm house keeping
4.	670201254	2/12/2014	(1) Tank signage
5.	666800787	3/20/2015	None
6.	666802740	11/16/2016	None
7.	689301832	8/27/2018	(2) Weeds on location, staining by blowdown tank
8.	689301999	9/27/2018	None
9.	697900606	10/18/2019	None
10.	700701600	9/22/2020	None

None of these inspections noted deficiencies within the interim reclamation area or staining identified on the surface of the well pad due to this release. All inspections can be found on the COGIS database using COGCC Location ID 421392.

Based on the initial response to the release, the series of documented inspections at the site, the unknown disposition of remaining soil and gravel scraped up and reapplied elsewhere, and the spill release occurring within the interim reclamation area, Caerus requests closure of this spill. Caerus proposes to defer investigation and sample analysis within the area of the well pad 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 the interim reclamation area which occurred in 2011.

Thank you,

Blair Rollins

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