

STATE OF
COLORADO

Yeldell - DNR, Amy <amy.yeldell@state.co.us>

May 13 - Undesirable Event - Natural Soda1 message

Kirk Daehling <kdaehling@naturalsoda.com>

Tue, May 14, 2019 at 7:59 AM

To: "paul_Daggett@blm.gov" <paul_Daggett@blm.gov>, "Yeldell - DNR, Amy" <amy.yeldell@state.co.us>

Cc: Clive Beckington <cbeckington@naturalsoda.com>, Gerry Deschaine <gdeschaine@naturalsoda.com>, "Daub, Gerald" <gjdaub@daubandassociates.com>, "Travis.Marshall@state.co.us" <Travis.Marshall@state.co.us>

Paul and Amy,

At approximately 1:30 pm, May 13th, a Contractor working on the 8H well pad noted steam and fluid leaking from the south wellfield pipeline. He notified operations who responded within 5 minutes and discovered that the packing on the 12-inch knifegate valve on the barren liquor line was leaking. A maintenance mechanic attempted to tighten the packing but this was not effective in stopping the leak. At approximately 2:00 pm, the barren pumps were isolated from the south wellfield line and this section of line was drained into 15H injection well. Due to the temperature of the barren brine (approximately 235 degF), there was significant "burping" of the line due to boiling of the fluid as the pressure was relieved. This contributed additional volume to the spill. Once the line drained and cooled to the point that maintenance work could be completed, which was approximately 4:30 pm, the packing was replaced and the line was put back into service without incident.

Fluid from the leak was fully contained on the 15H SSMW pad by diking. We also used the plant water truck to pump out 1 full load of brine to manage the level inside the diked area. The water truck has a capacity of 90 barrels so we are estimating that approximately 150 barrels of barren brine leaked during this event. I have attached a picture of the leak area as well as the containment dike that was constructed.

Paul – I called and left a preliminary message on your phone yesterday indicating that I didn't have an estimate of the spill volume but that we had the spill under control. In checking the regulations on the BLM website (below) for a major undesirable event, I would interpret that because the spill never left the disturbed area, we should be in compliance by notifying you in writing. Please let me know what other information you may need regarding this incident.

The NTL-3A, 44 Fed. Reg. 2205 (Jan. 10, 1979)¹, defines MUE as:

- A. Oil, saltwater, or toxic liquid spills, or any combination thereof, which results in the discharge (spilling) of 100 or more barrels of liquid; however, discharges of such magnitude, if entirely contained within the facility firewall, may be reported only in writing;

Amy – Since you are planning to be on-site, today, Clive will be able to show you the area where this event occurred and you can review the incident with him and get any additional information that you may need as well.

I am out of the office today but will be back tomorrow morning and will follow-up on any further information requests that you may have.

Sincerely,

Kirk Daehling

President



Natural Soda

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Thank you

2 attachments



5-13-19 pic 1.jpg
573K



5-13-19 pic 2.jpg
490K



