

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Grenora Dig #12 - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VIII

Subject: POLREP #1
Initial POLREP Grenora Dig #12 Site
Grenora Dig #12
Z8ES
Dagmar, MT
Latitude: 48.5149500 Longitude: -104.1021000

To:
From: Craig Myers, OSC
Date: 4/24/2014
Reporting Period:

1. Introduction

1.1 Background

Site Number:	Z8ES	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	4/16/2013
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E13810	Reimbursable Account #:	

1.1.1 Incident Category

OPA Removal Assessment

1.1.2 Site Description

In 2012, Enbridge was performing an abandonment project for small diameter pipelines associated with crude oil production lease sites in oil fields throughout Enbridge's North Dakota gathering system. Enbridge's gathering system extends across northwestern North Dakota into northeastern Montana. The small diameter pipelines (typically 2-inch) connected crude oil production wells and associated tank batteries to Enbridge's pipeline gathering system. The practice of moving oil through the small diameter pipes into Enbridge's gathering system terminated more than 10 years ago. Oil from production wells has since been transported off the sites via tanker trucks. The small diameter pipes were therefore no longer necessary and, Enbridge has been disconnecting, also known as abandoning, them from its gathering system pipelines.

Evidence of an historical crude oil release was discovered at the Grenora Dig #12 Site in the Dwyer Field during the abandonment work. The site is on Enbridge's gathering system right-of-way [Barr, 2012]

1.1.2.1 Location

Site Address: Dwyer Road, Dagmar, Montana
Zip Code: 59219
County: Sheridan
Township: 32N Range: 59E Section: 19 (SE¼ of NW¼)
USGS 7.5-Minute Quadrangle Map: Brush Lake
Latitude: 48.51495 Longitude: -104.10210

The site is located approximately 1/2 mile from Cottonwood Creek; however, much of the area between the river appears to be an adjacent wetland under the Clean Water Act. The release location is less than 50 feet from the wetland. It should also be noted that the site is approximately 5 miles upstream from the Medicine Lake National Wildlife Refuge.

1.1.2.2 Description of Threat

Given the unknown nature of the release and its proximity to the wetland, the OSC has initiated an assessment effort to evaluate the threat posed to the wetland.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The OSC had determined that additional assessment was necessary after reviewing the initial reports of the abandonment work and discovery of the discharge. To that end, Enbridge had planned to do additional soil removal last summer. Significant rainfall and the discovery of a previously unknown and improperly abandoned line precluded the scheduled work. A small quantity of oil was discovered when the newly discovered line was uncovered. Limited assessment was done by hand boring, with results presented in an August 2013 memo from Barr. It is unknown at this time how much product remains in the newly discovered line.

Enbridge was unwilling to open up someone else's line and was, in any event due to the unexpected discovery, un-prepared to recover even a modest amount of oil if the line was anything other than empty.

At this time, EPA is assuming the lead for further assessment activities.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

None other than identified herein.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Appropriate inquiries are being made as to the ownership of the newly discovered line.

2.1.4 Progress Metrics

None.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The OSC is exploring the utility and effectiveness of using geophysical techniques to locate preferential flow pathways and subsurface paleo channels in order to plan soil borings and/or a well installation to further evaluate the magnitude and spread of both the historic discharge and the impact of the improperly abandoned line.

The improperly abandoned line will be assessed and properly capped. Schedule TBD, see below.

2.2.1.2 Next Steps

Determine ownership of the improperly abandoned line.

2.2.2 Issues

Records appear to be limited as to the ownership of the line. The OSC may need to enlist the assistance of a title search contractor to ferret out the details. cursory records searches performed by the START contractor did not produce any useful information.

The OSC is still researching how effective geophysical investigation is when attempted in a marshy environment.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

N/A

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

N/A

4. Personnel On Site

None.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/GrenoraDig

6.2 Reporting Schedule

The next report will be filed as site events warrant.

7. Situational Reference Materials

No information available at this time.