

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

08/16/2019

Submitted Date:

08/22/2019

Document Number:

688800607**FIELD INSPECTION FORM**Loc ID 320837 Inspector Name: Hughes, Jim On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10000Name of Operator: BP AMERICA PRODUCTION COMPANYAddress: 1199 MAIN AVENUE SUITE 101City: DURANGO State: CO Zip: 81301**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**18 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
Beebe, Sabre	970-779-9398	Sabre.Beebe@bpx.com	SW Inspection Reports
Inspections, All		SanJuanCOGCC@bp.com	SW Inspection Reports

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205066	WELL	IJ	10/01/2018	DSPW	007-05179	LUCHINI WATER DISPOSAL(EPA) 1	EI
205264	WELL	PR		GW	007-06143	LUCHINI 32-6-12 1	EI
466711	SPILL OR RELEASE	AC	08/14/2019		-	Luchini Injection Transfer Pump	EI

General Comment:

On August 16, 2019 COGCC SW EPS Jim Hughes conducted an environmental field inspection of the BP Luchini Water Disposal Well #1. For the most recent field inspection report of this facility, please refer to document #685305561. This site visit was in response to Spill/Release Point ID #466711.

Location				
Lease Road:				
Type	Access			
comment:				
Corrective Action	L			Date:
Overall Good: <input checked="" type="checkbox"/>				
Signs/Marker:				
Type	TANK LABELS/PLACARDS			
Comment:	PBV does not have contents or NFPA placard.			
Corrective Action:	Install sign to comply with Rule 210.d.			Date: 10/22/2019
Type	WELLHEAD			
Comment:	Luchini 32-6-12 #1 sign posted near entrance to location.			
Corrective Action:				Date:
Type	TANK LABELS/PLACARDS			
Comment:	ASTs are labeled with contents, capacity, and have NFPA placards.			
Corrective Action:				Date:
Type	OTHER			
Comment:	Luchini Water Disposal Well Facility sign on gate at entrance to location.			
Corrective Action:				Date:
Emergency Contact Number:				
Comment:	Posted on location signs.			
Corrective Action:				Date: _____
Good Housekeeping:				
Type	UNUSED EQUIPMENT			
Comment:	Well house for injection well has been removed is not in use.			
Corrective Action:				Date:
Overall Good: <input checked="" type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				
Fencing/:				
Type	PUMP JACK			
Comment:	Stock panel enclosure and guard fencing for pump jack.			
Corrective Action:				Date:
Equipment:				
Type: Other	# 2			corrective date
Comment:	Valve can and valve sets.			

Corrective Action:		Date:	
Type: Bird Protectors	# 7		
Comment:			
Corrective Action:		Date:	
Type: Gas Meter Run	# 1		
Comment:			
Corrective Action:		Date:	
Type: Ancillary equipment	# 1		
Comment:	Telemetry equipment.		
Corrective Action:		Date:	
Type: Ancillary equipment	# 1		
Comment:	Injection pump shack.		
Corrective Action:		Date:	
Type: Vertical Heated Separator	# 1		
Comment:			
Corrective Action:		Date:	
Type: Ancillary equipment	# 1		
Comment:	Electrical supply control shack.		
Corrective Action:		Date:	
Type: Pump Jack	# 1		
Comment:	On 32-6-12 #1 well head.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<100 BBLS	PBV STEEL		37.029601,-107.454467
Comment:	Top seam of PBV appears to be damaged along NE edge. Tank is rusting and needs painted.				
Corrective Action:				Date:	

Paint

Condition	Inadequate
Other (Content)	
Other (Capacity)	95 bbl.
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Concrete	Adequate	Walls Sufficient	Base Sufficient	Adequate	
Comment:					
Corrective Action:			Date:		
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	6	300 BBLS	HEATED STEEL AST		37.029411,-107.454411

Comment:		
Corrective Action:		Date:

Paint

Condition	Adequate	
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Concrete	Adequate	Walls Sufficient	Base Sufficient	Adequate
Comment:				
Corrective Action:				Date:

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected FacilitiesFacility ID: 205066 Type: WELL API Number: 007-05179 Status: IJ Insp. Status: EIFacility ID: 205264 Type: WELL API Number: 007-06143 Status: PR Insp. Status: EIFacility ID: 466711 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental**Spills/Releases:**

Type of Spill: PRODUCED WATER

Estimated Spill Volume: 9

Comment: [See Spill/Release Point ID #466711 for more information regarding this release.](#)Corrective Action: [Control and contain spills/releases and clean up per Rule 906.a. Contact COGCC EPS staff.](#)

Date: 09/23/2019

Reportable: YES

GPS: Lat 37.029639

Long -107.454325

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Reclamation - Storm Water - Pit**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Gravel	Pass	Gravel	Pass			
Compaction	Pass	Compaction	Pass			

Comment: Corrective Action: Date: **Pits:** ☒ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
<p>On August 16, 2019 COGCC SW EPS Jim Hughes conducted an environmental field inspection of the BP Luchini Water Disposal Well #1. For the most recent field inspection report of this facility, please refer to document #685305561. This site visit was in response to Spill/Release Point ID #466711.</p> <p>During this inspection the well head for the Luchini 32-6-12 #1 was observed to be wet and stained.</p> <p>Standing water remained at Spill/Release Point ID #466711. Remove free fluids resulting from release immediately.</p> <p>The 95 bbl. PBV at the north end of the containment area appears to have a compromised top seam along the NE edge. This PBV is not labeled accordingly per Rule 210.d.</p> <p>The well house shack has been removed from over the injection well.</p> <p>A gravel berm area was observed in the NW corner of the injection well location. The operator shall provide an update as to what this structure's intended purpose is.</p>	hughesjo	08/22/2019

Attached DocumentsYou can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
688800608	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4916960