

**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:

04/01/2020

Submitted Date:

04/01/2020

Document Number:

697000922

**FIELD INSPECTION FORM**
 Loc ID 446104 Inspector Name: Peterson, Tom On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**

OGCC Operator Number: 10542

Name of Operator: CUB CREEK ENERGY

Address: 200 PLAZA DRIVE SUITE 100

City: HIGHLANDS State: CO Zip: 80129

**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

38 Number of Comments

13 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
Baily, Scott		scott.baily@cub-creek.com	<a href="#">All Inspections</a>
Kraich, Adam		adam.kraich@state.co.us	
Pesicka, Conor		conor.pesicka@state.co.us	
Rico, Trenton		trenton.rico@cub-creek.com	
Morse, Jenny		jenny.morse@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
446099	WELL	PR	01/31/2017	OW	123-43242	MARKHAM 10	PR
446100	WELL	PR	01/19/2017	OW	123-43243	MARKHAM 4	PR
446101	WELL	PR	02/06/2017	OW	123-43244	MARKHAM 6	PR
446102	WELL	PR	01/22/2017	OW	123-43245	MARKHAM 7	PR
446103	WELL	PR	01/29/2017	OW	123-43246	MARKHAM 9	PR
446105	WELL	PR	09/01/2018	OW	123-43247	MARKHAM 5	PR
446106	WELL	PR	04/17/2018	OW	123-43248	MARKHAM 8	PR
446107	WELL	PR	01/12/2017	OW	123-43249	MARKHAM 3	PR
446207	WELL	PR	02/08/2017	OW	123-43274	MARKHAM 12	PR
446208	WELL	PR	10/01/2018	OW	123-43275	MARKHAM 11	PR
447875	WELL	PR	03/19/2018	OW	123-43649	MARKHAM 2	PR
447876	WELL	PR	10/01/2018	OW	123-43650	MARKHAM 1	PR

**General Comment:**

Location			
<b>Lease Road:</b>			
Type	Other		
comment:	Location has been damaged. See attached photo.		
Corrective Action	Per conditions listed in 2A document #400990702, location is within a designated setback location, maintain and repair access roads per Rule 604.c.(2)S.	Date:	05/04/2020
Type	Main		
comment:	Lease road has been heavily damaged. See attached photos.		
Corrective Action	Per conditions listed in 2A document #400990702, location is within a designated setback location, maintain and repair access roads per Rule 604.c.(2)S.	Date:	05/04/2020
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	TANK LABELS/PLACARDS		
Comment:	Produced water tanks lack capacity placards. See attached photos.		
Corrective Action:	Install sign to comply with Rule 210.d.	Date:	05/04/2020
Type	OTHER		
Comment:	Lease road entrance		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	x 12		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	VRT lacks all placards. See attached photos.		
Corrective Action:	Install sign to comply with Rule 210.d.	Date:	05/04/2020
Type	CONTAINERS		
Comment:	Methanol and chemical systems		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
<b>Good Housekeeping:</b>			
Type	UNUSED EQUIPMENT		
Comment:	Unused vertical separator at east side of location. See attached photos.		
Corrective Action:	Comply with Rule 603.f .	Date:	05/04/2020
Type	OTHER		
Comment:	Various stained soil spotting around location. See attached photos.		
Corrective Action:	Properly dispose of oily waste in accordance with 907.e.	Date:	05/04/2020
Type	TRASH		
Comment:	Miscellaneous trash around location. See attached photos.		

Corrective Action:	Per conditions listed in 2A document #400990702, location is within a designated setback location, remove trash or debris per Rule 604.c.(2)P.	Date:	05/04/2020
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Overall Good: ☐

<b>Spills:</b>				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	LOCATION		
Comment:	Chain link		
Corrective Action:		Date:	

<b>Equipment:</b>			corrective date
Type: Pig Station	# 3		
Comment:			
Corrective Action:		Date:	
Type: Gas Meter Run	# 1		
Comment:	Noble midsteram meter has current calibration card. See attached photo.		
Corrective Action:		Date:	
Type: Other	# 6		
Comment:	Wellhead master valves are leaking. See attached photos.		
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.	Date:	05/04/2020
Type: Bird Protectors	# 19		
Comment:			
Corrective Action:		Date:	
Type: Ancillary equipment	#		
Comment:	Automation array, solar array, methanol and chemical systems		
Corrective Action:		Date:	
Type: Emission Control Device	# 6		
Comment:	ECD units have been damaged with one unit having caught fire, remaining units have crude oil on concrete pads and flame arrestors damaged. See attached photos.		
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. No incident report was filed. Comply with Rule 602.c.(1)	Date:	05/04/2020
Type: LACT	# 1		
Comment:			
Corrective Action:		Date:	
Type: Prime Mover	# 1		
Comment:	Natural gas engine on compressor		

Corrective Action:		Date:	
Type: Vertical Separator	# 4		
Comment:			
Corrective Action:		Date:	
Type: Bradenhead	# 12		
Comment:	Bradenhead valves are exposed at surface.		
Corrective Action:		Date:	
Type: Plunger Lift	# 12		
Comment:			
Corrective Action:		Date:	
Type: Compressor	# 1		
Comment:			
Corrective Action:		Date:	
Type: Horizontal Heated Separator	# 13		
Comment:			
Corrective Action:		Date:	
Type: Gas Meter Run	# 2		
Comment:	DCP meters do not have current calibration cards.		
Corrective Action:	Measure gas per Rule 329.	Date:	05/04/2020
Type: VRT	# 1		
Comment:			
Corrective Action:		Date:	
Type: Other	# 2		
Comment:	Lube oil tanks are in containment but lack wildlife netting. Wildlife protections devices not adequate. See attached photo.		
Corrective Action:	Install or repair wildlife protection equipment.	Date:	05/04/2020
Type: Prime Mover	# 2		
Comment:	Electric motors on LACT		
Corrective Action:		Date:	
Type: Other	# 1		
Comment:	Chemicals, wastes, equipment are not covered or stored in manner to minimize contact with precipitation or stormwater. Methanol drum stored next to genset and methanol totes are out of containment. See attached photos		
Corrective Action:	Implement BMP following good engineering practices to minimize contact with stormwater and precipitation.	Date:	05/04/2020

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	1	<50 BBLs	PBV FIBERGLASS		,
Comment:	24 bbls				
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficent	Base Sufficent	Adequate	
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<100 BBLS	PBV CONCRETE		,
Comment:	60 bbls				
Corrective Action:				Date:	

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficent	Base Sufficent	Adequate	
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	2	400 BBLS	STEEL AST		,
Comment:					
Corrective Action:				Date:	

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficent	Base Sufficent	Adequate	
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	8	400 BBLS	STEEL AST		,

Comment:		
Corrective Action:		Date:

**Paint**

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

**Berms**

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

**Venting:**

Yes/No	YES		
Comment:	Crude oil tank blowdown is open, separator #6 and #7 burner pilots are out causing venting through burner stacks and separator controls are venting. See attached FLIR videos. Company representative arrived to shut in equipment while inspector was on location.		
Corrective Action:	Comply with Rule 912.		Date: 05/04/2020

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	446099	Type:	WELL	API Number:	123-43242	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446100	Type:	WELL	API Number:	123-43243	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446101	Type:	WELL	API Number:	123-43244	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446102	Type:	WELL	API Number:	123-43245	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446103	Type:	WELL	API Number:	123-43246	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446105	Type:	WELL	API Number:	123-43247	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446106	Type:	WELL	API Number:	123-43248	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			
Facility ID:	446107	Type:	WELL	API Number:	123-43249	Status:	PR	Insp. Status:	PR
<b>Producing Well</b>									
Comment:	PR								
Corrective Action:						Date:			

Facility ID:	446207	Type:	WELL	API Number:	123-43274	Status:	PR	Insp. Status:	PR
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**Producing Well**

Comment: PR

Corrective Action:

Date:

Facility ID:	446208	Type:	WELL	API Number:	123-43275	Status:	PR	Insp. Status:	PR
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**Producing Well**

Comment: PR

Corrective Action:

Date:

Facility ID:	447875	Type:	WELL	API Number:	123-43649	Status:	PR	Insp. Status:	PR
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**Producing Well**

Comment: PR

Corrective Action:

Date:

Facility ID:	447876	Type:	WELL	API Number:	123-43650	Status:	PR	Insp. Status:	PR
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**Producing Well**

Comment: PR

Corrective Action:

Date:



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

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:

Corrective Action:  Date:

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
<p><b>COGCC Inspection Report Summary</b></p> <p>On Wednesday 4/1/2020 at approximately 09:10 hours, I, Inspector Tom Peterson, conducted an on-site inspection at the Cub Creek Markham location #446104 in Weld County, Colorado.</p> <p>While there, I observed miscellaneous trash and unused equipment around location, DCP Midstream meter calibration cards were missing, inadequate wildlife netting around lube oil storage tanks, inadequate chemical storage on location, damaged ECD units, one burned ECD unit with no incident reported to COGCC, venting from crude oil tanks and separators, stained soil at various spots around location, damaged lease road and location, and missing produced water tank capacity placards. During this inspection the following possible compliance issues were observed: Rule 210.d. with a corrective action date of 5/4/2020, Rule 324 A.a. with a corrective action date of 5/4/2020, Rule 329 with a corrective action date of 5/4/2020, Rule 602 with a corrective action date of 5/4/2020, Rule 603.f. with a corrective action date of 5/4/2020, Rule 604.c.(2) P with a corrective action date of 5/4/2020, Rule 604.c.(2) S with a corrective action date of 5/4/2020, Rule 605.d. with a corrective action date of 5/4/2020, Rule 907.e. with a corrective action date of 5/4/2020. Rule 912 with a corrective action date of 5/4/2020.</p> <p>A follow up on this site inspection needs to be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.</p> <p>This is a summary of the inspection report.</p>	petersont	04/01/2020

**Attached Documents**

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

Document Num	Description	URL
402359484	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112930">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112930</a>
697000923	Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112921">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112921</a>
697000924	FLIR video	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112922">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112922</a>
697000925	FLIR video	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112923">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112923</a>
697000926	FLIR video	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112924">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5112924</a>