

**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:

04/23/2020

Submitted Date:

04/23/2020

Document Number:

697001101

FIELD INSPECTION FORM

Loc ID 318870 Inspector Name: Peterson, Tom On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

OGCC Operator Number: 10542
Name of Operator: CUB CREEK ENERGY
Address: 200 PLAZA DRIVE SUITE 100
City: HIGHLANDS State: CO Zip: 80129

Findings:

- 26 Number of Comments
- 8 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
Rico, Trenton		trenton.rico@cub-creek.com	
Leonard, Mike		mike.leonard@state.co.us	
Baily, Scott		scott.baily@cub-creek.com	All Inspections
Morse, Jennifer		jennifer.morse@state.co.us	
Kraich, Adam		adam.kraich@state.co.us	
Pesicka, Conor		conor.pesicka@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
445614	WELL	SI	01/01/2020	OW	123-43128	Haley 9HZ	SI
445615	WELL	PR	01/01/2020	OW	123-43129	Haley 6HZ	PR
445617	WELL	PR	09/01/2017	OW	123-43131	Haley 2HZ	SI
445618	WELL	PR	09/01/2017	OW	123-43132	Haley 4HZ	PR
445620	WELL	PR	10/01/2017	OW	123-43134	Haley 10HZ	SI
445621	WELL	PR	08/01/2019	OW	123-43135	Haley 8HZ	PR
445622	WELL	SI	12/01/2019	OW	123-43136	Haley 3HZ	SI

General Comment:

Location

Overall Good:

Signs/Marker:			
Type	CONTAINERS		
Comment:	Lube oil storage, chemical and methanol systems		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Concrete vault at compressor lacks all placards. See attached photo.		
Corrective Action:	Install sign to comply with Rule 210.d.	Date:	05/29/2020
Type	WELLHEAD		
Comment:	x 7		
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	VRT's lack all placards. See attached photos.		
Corrective Action:	Install sign to comply with Rule 210.d.	Date:	05/29/2020
Type	OTHER		
Comment:	Lease road entrance		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____

Good Housekeeping:			
Type	STORAGE OF SUPL		
Comment:	Chemical drums stored out of containment. Chemicals, wastes, equipment are not covered or stored in manner to minimize contact with precipitation or stormwater. See attached photos.		
Corrective Action:	Implement BMP following good engineering practices to minimize contact with stormwater and precipitation.	Date:	05/29/2020
Type	OTHER		
Comment:	Stained soil around compressor. See attached photos.		
Corrective Action:	Properly dispose of oily waste in accordance with 907.e.	Date:	05/29/2020

Overall Good:

Spills:			
Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:			
Type	WELLHEAD		
Comment:	Panel		
Corrective Action:			Date:
Type	LOCATION		
Comment:	Architectural steel		
Corrective Action:			Date:

Equipment:			corrective date
Type: Plunger Lift	# 7		
Comment:			
Corrective Action:			Date:
Type: Ancillary equipment	#		
Comment:	Automation array, solar array, ECD scrubbers, methanol and chemical systems, electrical systems, genset		
Corrective Action:			Date:
Type: Emission Control Device	# 5		
Comment:	Pilots are on		
Corrective Action:			Date:
Type: Prime Mover	# 2		
Comment:	Electric motors on LACT		
Corrective Action:			Date:
Type: Vertical Separator	# 4		
Comment:			
Corrective Action:			Date:
Type: Horizontal Heated Separator	# 7		
Comment:			
Corrective Action:			Date:
Type: VRT	# 2		
Comment:			
Corrective Action:			Date:
Type: Pig Station	# 2		
Comment:			
Corrective Action:			Date:
Type: LACT	# 1		
Comment:			
Corrective Action:			Date:
Type: Bird Protectors	# 12		
Comment:			

Corrective Action:		Date:	
Type: Bradenhead	# 7		
Comment:	Bradenhead valves are exposed at surface.		
Corrective Action:		Date:	
Type: Ancillary equipment	#		
Comment:	Lube oil storage secondary containment. Netting on open tanks inadequate. Wildlife protections devices not adequate.		
Corrective Action:	Install or repair wildlife protection equipment.	Date:	05/29/2020
Type: Gas Meter Run	# 1		
Comment:	Meter has no calibration card.		
Corrective Action:	Measure gas per Rule 329.	Date:	05/29/2020
Type: VRU	# 1		
Comment:			
Corrective Action:		Date:	
Type: Prime Mover	# 2		
Comment:	Natural gas engines on compressor and VRU.		
Corrective Action:		Date:	
Type: Compressor	# 1		
Comment:			
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	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 Sufficient	Base Sufficient	Adequate
Comment:				
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	1	OTHER	BV CONCRETE		40.209100,-105.033740
Comment:	Unknown capacity, at compressor.				
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
	Inadequate	Walls Insufficient	Base Sufficient	
Comment: Concrete vault at compressor lacks a berm. See attached photo.				
Corrective Action: Repair or install berms or other secondary containment devices per Rule 605.a.(4).				Date: 05/29/2020

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	1	<50 BBLs	PBV FIBERGLASS		40.209210,-105.033370
Comment: 5 bbls					
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:

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 Sufficient	Base Sufficient	Adequate
Comment:				
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	4	400 BBLs	STEEL AST		40.209660,-105.033110

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:	Various separators are venting. Company representative arrived while inspector was on location and shut off valves. See attached FLIR video.		
Corrective Action:	Comply with Rule 912.	Date:	05/29/2020

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities					
Facility ID:	445614	Type:	WELL	API Number:	123-43128
Status:	SI	Insp. Status:	SI		
Idle Well					
Purpose:	<input checked="" type="checkbox"/> Shut In	<input type="checkbox"/> Temporarily Abandoned	Reminder: _____		
Comment:	<input type="text"/>				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445615	Type:	WELL	API Number:	123-43129
Status:	PR	Insp. Status:	PR		
Producing Well					
Comment:	PR				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445617	Type:	WELL	API Number:	123-43131
Status:	PR	Insp. Status:	SI		
Idle Well					
Purpose:	<input checked="" type="checkbox"/> Shut In	<input type="checkbox"/> Temporarily Abandoned	Reminder: _____		
Comment:	<input type="text"/>				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445618	Type:	WELL	API Number:	123-43132
Status:	PR	Insp. Status:	PR		
Producing Well					
Comment:	PR				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445620	Type:	WELL	API Number:	123-43134
Status:	PR	Insp. Status:	SI		
Idle Well					
Purpose:	<input checked="" type="checkbox"/> Shut In	<input type="checkbox"/> Temporarily Abandoned	Reminder: _____		
Comment:	<input type="text"/>				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445621	Type:	WELL	API Number:	123-43135
Status:	PR	Insp. Status:	PR		
Producing Well					
Comment:	PR				
Corrective Action:	<input type="text"/>				Date: _____
Facility ID:	445622	Type:	WELL	API Number:	123-43136
Status:	SI	Insp. Status:	SI		
Idle Well					
Purpose:	<input checked="" type="checkbox"/> Shut In	<input type="checkbox"/> Temporarily Abandoned	Reminder: _____		
Comment:	<input type="text"/>				
Corrective Action:	<input type="text"/>				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
		Gravel	Pass			

Comment:

Corrective Action:

Date: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>COGCC Inspection Report Summary On Thursday 4/23/2020 at approximately 11:45 hours, I, Inspector Tom Peterson, conducted an on-site inspection at the Cub Creek Haley Pad location #318870 in Weld County, Colorado.</p> <p>While there, I observed that the Anadarko Midstream meter calibration card was missing, inadequate wildlife netting around lube oil storage tanks, inadequate chemical storage on location, venting from separators, stained soil at various spots around location, VRT units lacked all placards, compressor concrete vault with no berm or placards. During this inspection the following possible compliance issues were observed: Rule 210.d. with a corrective action date of 5/29/2020, Rule 324 A.a. with a corrective action date of 5/29/2020, Rule 329 with a corrective action date of 5/29/2020, Rule 605.a.(4). with a corrective action date of 5/29/2020, Rule 605.e.(4). with a corrective action date of 5/29/2020, Rule 906.d.(1) with a corrective action date of 5/29/2020, Rule 907.e. with a corrective action date of 5/29/2020, Rule 912 with a corrective action date of 5/29/2020, Rule 1002.f.(2)A with a corrective action date of 5/29/2020.</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	04/23/2020

Attached Documents

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

Document Num	Description	URL
402379678	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5131236
697001102	Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5131210
697001103	FLIR video	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5131211