

**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:

05/07/2020

Submitted Date:

05/08/2020

Document Number:

688307820

FIELD INSPECTION FORMLoc ID 317106 Inspector Name: Sherman, Susan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 81490

Name of Operator: ST CROIX OPERATING INC

Address: P O BOX 13799

City: DENVER State: CO Zip: 80201

Status Summary:

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

Findings:

16 Number of Comments

5 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 |
|--------------------|----------------|-----------------------------------|---------|
| Melnychenko, David | (303) 489-8428 | davidpmel@yahoo.com | |
| Gottlob, Paul | (720) 420-5747 | paul.gottlob@iptenergyservice.com | |
| Axelson, John | | john.axelson@state.co.us | |
| Young, Rob | | rob.young@state.co.us | |
| Leonard, Mike | | mike.leonard@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 236381 | WELL | PR | 05/01/2019 | OW | 121-08871 | STATE 2-16 | PR |

General Comment:**Wildlife Mortality Inspection**

On 5/7/2020 at approximately 13:00 hrs inspector found 2 dead song birds in a covered skim tank during a reinspection of inspection #688306730 where there were two, previous corrective actions: 1) Animal holes on NW cor of production tank berms (see attached photo). Corrective Action: Repair oil tank berms. CA Date: 01/31/2020; and 2) Holes and gaps in bird cover (see attached photo). Corrective Action Repair bird cover on skim tank. CA Date: 01/31/2020. Inspector contacted CPW.

LocationOverall Good: ☒**Signs/Marker:**

| | | | |
|--------------------|--|-------|------------|
| Type | TANK LABELS/PLACARDS | | |
| Comment: | Produced water skim tank is not labeled with NFPA nor quantity labels. | | |
| Corrective Action: | Install sign to comply with Rule 210.d. | Date: | 08/10/2020 |
| Type | WELLHEAD | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type | BATTERY | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Emergency Contact Number:

Comment: 970-324-0060

Corrective Action:

Date: _____

Good Housekeeping:

| | | | |
|--------------------|--|-------|------------|
| Type | UNUSED EQUIPMENT | | |
| Comment: | Poly pipe on ground north of pits, casing/tubing north of crude oil tanks (see attached photos). | | |
| Corrective Action: | Comply with Rule 603.f . | Date: | 08/10/2020 |

Overall Good: ☐**Spills:**

| Type | Area | Volume | | |
|------|------|--------|--|--|
|------|------|--------|--|--|

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Fencing/:**

| | | | |
|--------------------|----------|-------|--|
| Type | WELLHEAD | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Equipment:

| | | | |
|-------------------------------|--------------|-------|-----------------|
| Type: Progressive Cavity | # 1 | | corrective date |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type: Vertical Heater Treater | # 1 | | |
| Comment: | bermed, shed | | |
| Corrective Action: | | Date: | |
| Type: Bird Protectors | # | | |

| | | | | |
|--------------------------|--|--|-------|------------|
| Comment: | Install or repair wildlife protection equipment on all applicable equipment such as all open pipe ends on 500 bbl, metal produced water tank and skim tank; and treater (see attached photos). Prevent any unauthorized discharge (specify condition if it is E&P waste, improper disposal, trash, etc.). Bird nest on stairs to 500 bbl metal produced water tank (see attached photo). | | | |
| Corrective Action: | 324A. POLLUTION a. The operator shall take precautions to prevent significant adverse environmental impacts to air, water, soil, or biological resources to the extent necessary to protect public health, safety and welfare, including the environment and wildlife resources, taking into consideration cost-effectiveness and technical feasibility to prevent the unauthorized discharge or disposal of oil, gas, E&P waste, chemical substances, trash, discarded equipment or other oil field waste. | | Date: | 05/22/2020 |
| Type: FWKO | # 1 | | | |
| Comment: | | | | |
| Corrective Action: | | | Date: | |
| Type: Deadman # & Marked | # 4 | | | |
| Comment: | | | | |
| Corrective Action: | | | Date: | |

Tanks and Berms:

| Contents | # | Capacity | Type | Tank ID | SE GPS |
|--------------------|---|----------|----------------|---------|--------|
| PRODUCED WATER | 1 | 200 BBLs | FIBERGLASS AST | | , |
| Comment: | | | | | |
| Corrective Action: | | | | | Date: |

Paint

| | |
|------------------|--|
| Condition | |
| Other (Content) | |
| Other (Capacity) | |
| Other (Type) | |

Berms

| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|--------------------|----------|---------------------|---------------------|-------------|
| Earth | Adequate | | | |
| Comment: | | | | |
| Corrective Action: | | | | Date: |

| Contents | # | Capacity | Type | Tank ID | SE GPS |
|--------------------|-----------|----------|------------------|---------|--------|
| CRUDE OIL | 1 | 500 BBLs | HEATED STEEL AST | | , |
| Comment: | insulated | | | | |
| Corrective Action: | | | | | Date: |

Paint

| | |
|------------------|--|
| Condition | |
| Other (Content) | |
| Other (Capacity) | |
| Other (Type) | |

Berms

| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|------|----------|---------------------|---------------------|-------------|
| | | | | |

| | | | | | |
|--------------------|----------|--|---------------------|-------------|--------|
| Comment: | | same earth berms as other 500 bbl crude oil tank | | | |
| Corrective Action: | | Date: | | | |
| Contents | # | Capacity | Type | Tank ID | SE GPS |
| PRODUCED WATER | 1 | 500 BBLs | STEEL AST | | , |
| Comment: | | bolted | | | |
| Corrective Action: | | Date: | | | |
| <u>Paint</u> | | | | | |
| Condition | | | | | |
| Other (Content) | | | | | |
| Other (Capacity) | | | | | |
| Other (Type) | | | | | |
| <u>Berms</u> | | | | | |
| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance | |
| | | | | | |
| Comment: | | same earth berms as 200 bbl, fiberglass, produced water tank | | | |
| Corrective Action: | | Date: | | | |
| Contents | # | Capacity | Type | Tank ID | SE GPS |
| CRUDE OIL | 1 | 500 BBLs | STEEL AST | | , |
| Comment: | | bolted tank | | | |
| Corrective Action: | | Date: | | | |
| <u>Paint</u> | | | | | |
| Condition | | | | | |
| Other (Content) | | | | | |
| Other (Capacity) | | | | | |
| Other (Type) | | | | | |
| <u>Berms</u> | | | | | |
| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance | |
| Earth | | | | | |
| Comment: | | Animal holes on NW cor of production tank berms. | | | |
| Corrective Action: | | Repair oil tank berms. Date: 01/31/2020 | | | |
| | | Date: 01/31/2020 | | | |
| <u>Venting:</u> | | | | | |
| Yes/No | NO | | | | |
| Comment: | | | | | |
| Corrective Action: | | | | | Date: |
| <u>Flaring:</u> | | | | | |
| Type | | | | | |
| Comment: | | | | | |
| Corrective Action: | | | | | Date: |

Location Construction

Location ID: 236381 CDP: _____

Comment: _____

Corrective Action: _____

Date: _____

Form 2A COAs:

Comment: No COAs.

Corrective Action: _____

Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____

Date: _____

Comment: _____

Corrective Action: _____

Date: _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____

Address: _____

Phone Number: _____

Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____

Phone Number: _____

Date Onsite Request Received: _____

Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____

Phone Number: _____

Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

| Inspected Facilities | | | | | | | | | |
|----------------------|---|-------|------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 236381 | Type: | WELL | API Number: | 121-08871 | Status: | PR | Insp. Status: | PR |
| Producing Well | | | | | | | | | |
| Comment: | PR. 2/1/2020 production reported to COGCC database. | | | | | | | | |
| 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 PITType: Produced WaterLined: NOPit ID: Lat: Long: Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition: Comment: Corrective Action: Date: **Fencing:**Fencing Type: NoneFencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Netting Condition: Comment: Corrective Action: Date: Anchor Trench Present: Oil Accumulation: NO2+ feet Freeboard: YESComment: Corrective Action: Date: Type: Skimming/SettlingLined: YESPit ID: Lat: Long: Reference Point: Other: Length: Width: **Lining:**Liner Type: OtherLiner Condition: Comment: metal open top tank with coveringsCorrective Action: Date: **Fencing:**Fencing Type: NoneFencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Metal GridNetting Condition:

| | | | | | |
|-----------------------------|---|-----------------------------|--|-------------------------------|-------------------------|
| Comment: | Holes and gaps in bird cover (see attached photos). | | | | Date: <u>01/31/2020</u> |
| Corrective Action | Repair bird cover on skim tank. | | | | |
| Anchor Trench Present: | | Oil Accumulation: | | 2+ feet Freeboard: | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| Type: <u>Produced Water</u> | | Lined: <u>NO</u> | | Pit ID: Lat: Long: | |
| Reference Point: _____ | | Other: _____ | | Length: _____ Width: _____ | |
| <u>Lining:</u> | | | | | |
| Liner Type: | | Liner Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| <u>Fencing:</u> | | | | | |
| Fencing Type: <u>None</u> | | Fencing Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| <u>Netting:</u> | | | | | |
| Netting Type: | | Netting Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| Anchor Trench Present: | | Oil Accumulation: <u>NO</u> | | 2+ feet Freeboard: <u>YES</u> | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| Type: <u>Produced Water</u> | | Lined: <u>NO</u> | | Pit ID: Lat: Long: | |
| Reference Point: _____ | | Other: _____ | | Length: _____ Width: _____ | |
| <u>Lining:</u> | | | | | |
| Liner Type: | | Liner Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| <u>Fencing:</u> | | | | | |
| Fencing Type: <u>None</u> | | Fencing Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| <u>Netting:</u> | | | | | |
| Netting Type: | | Netting Condition: | | | |
| Comment: | | | | | Date: |
| Corrective Action | | | | | |
| Anchor Trench Present: | | Oil Accumulation: <u>NO</u> | | 2+ feet Freeboard: <u>YES</u> | |

| | | |
|-------------------|--|-------|
| Comment: | | Date: |
| Corrective Action | | |

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------------------------|---|
| 402394004 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5146047 |
| 688307823 | St Croix Operating State 2-16 | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5146043 |