

**FORM
INSP**Rev
X/20**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:

09/12/2023

Submitted Date:

09/26/2023

Document Number:

696205276

FIELD INSPECTION FORMLoc ID 438248 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 7125

Name of Operator: BEEMAN OIL & GAS INC

Address: 13635 E 104TH AVENUE STE 400

City: COMMERCE CITY State: CO Zip: 80022

Status Summary:

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

Findings:

15 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
Fischer, Alex		alex.fischer@state.co.us	
Neidel, Kris		kris.neidel@state.co.us	
Maxwell, Logan		logan.maxwell@state.co.us	
		jspconcrete@yahoo.com	
Arthur, Denise		denise.arthur@state.co.us	
		cassyswasey@gmail.com	

General Comment:

On 9/12/2023, Reclamation Specialists' Aaron Trujillo and Logan Maxwell conducted a follow-up interim and reclamation and stormwater inspection at Beeman Oil and Gas Inc's Diamond T Sheep Location # 438248 in Moffat County, CO. ECMC staff had a conversation with the Operator representatives, Will and Kelly, on Location.

This is a follow-up to Inspection #702801510 dated 5/10/2023 to assess compliance with the following corrective actions:

- Signage
- Good Housekeeping
- Undesirable Plant Species
- Spills
- Interim Reclamation

It was observed in this inspection that the Location remains out of compliance with ECMC Rules and Corrective Actions. Refer to the "Location," "Environmental," "Reclamation," "Stormwater," and "ECMC comments" section of this inspection report for additional details.

Any corrective actions from the previous inspections that have not been addressed are still applicable.

LocationOverall Good: ☐

Signs/Marker:			
Type	BATTERY		
Comment:	Signage at battery has been installed per 605 Rules. This CA has been resolved.		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Signage at battery has been installed per 605 Rules. This CA has been resolved.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: (970) 210-2896

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	<p>Previous inspections observed unused equipment throughout the Location (hog paneling, machinery, etc...).</p> <p>It was observed in this inspection that equipment such as heavy machinery has been removed, however, Good Housekeeping on the Location remains inadequate, and various unused tanks/containers, panels, pipe, etc... remain on the Location. This CA will remain applicable.</p>		
Corrective Action:	Comply with Rule 606.	Date:	06/09/2023
Type	WEEDS		
Comment:	<p>Previous inspection observed that Noxious and Undesirable Plant Species (Scotch thistle, Russian thistle) were widespread and dominant within the interim areas.</p> <p>Though evidence of some weed management (spraying) was evident, it was observed in this inspection that work to manage Undesirable and Noxious Plant Species on the Location has been inadequate; Scotch and Russian thistle remain established throughout the interim areas of the Location. This CA will remain applicable.</p>		
Corrective Action:	Comply with Rules 606.c and 1003.f: Conduct weed management to prevent further establishment and spread of undesirable and noxious plant species; ongoing weed management required until location passes final reclamation.	Date:	05/24/2023

Overall Good: ☐

Spills:			
Type	Area	Volume	
Comment:	See "Comment #1" under "COGCC Comments" at the end of this report.		
Corrective Action:	<p>- Remove and properly dispose of impacted material at an approved Facility. Provide waste manifest documentation on a FIRR.</p> <p>- Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.</p> <p>- Implement or modify BMPs for improved material handling and spill prevention.</p>		Date: 05/08/2023

Comment:	Impacted soils have been documented throughout the location in previous inspections and appear to have been cleaned up. However, there are newly documented stained soils across the Location observed: -Near the soil pile on the western edge of the working pad -Areas around and within the sheds on the north end of the Location		
Corrective Action:	Clean/Remediate impacted soils to Table 915-1 cleanup concentrations. Provide waste manifest documentation on a FIRR.	Date:	09/12/2023

In Containment: No

Comment: Spill within separator containment appears to have been cleaned. This CA has been resolved.

☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal				Inadequate
Comment:	Tears/holes observed within the secondary containment berm at the separator equipment.			
Corrective Action:	Install or repair secondary containment; ensure BMP remains impervious to contain a spill or release.			Date: 09/12/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: [See "Comment #2" under "COGCC Comments" at the end of this report.](#)Corrective Action: **Control and contain spills/releases and clean up per Rule 912.a. Remove and properly dispose of impacted fluids/materials. Comply with Rule 912 for Spills/Releases. Provide waste manifest documentation on a FIRR**

Date: 05/08/2023

Reportable: _____

GPS: Lat _____ Long _____

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**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? In Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? Fail

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured In 80% Revegetation Fail

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? F

Comment

Previous inspection observed that interim reclamation of the Location had not been performed. Inspections required Operator to comply with 1003 Rules.

It was observed in this inspection that, though reclamation activities have taken place and the working pad area has been reduced to the south of the wells, including re-grading and re-contouring, interim reclamation activities such as replacement of topsoil and seeding has not been completed.

This corrective action will remain applicable until addressed in its entirety.

Corrective Action

- Reduce areas no longer needed for production by 11/15/2023. If areas are reasonably needed for production activities, provide documentation in a factual review that outlines why areas outside a 100 foot radius of the well are necessary for production per rule 1003.b.

- Conduct additional reclamation on previously reclaimed areas. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels. Revegetation activities shall be completed no later than 11/15/2023.

Date 11/15/2023

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

Reminder: _____

Comment: _____

Well plugged _____

Pit mouse/rat holes, cellars backfilled _____

Debris removed _____

No disturbance /Location never built _____

Access Roads Regraded _____

Contoured _____

Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____

Locations, facilities, roads, recontoured _____

Compaction alleviation _____

Dust and erosion control _____

Non cropland: Revegetated 80% _____

Cropland: perennial forage _____

Weeds present _____

Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: _____

Corrective Action: _____

Date _____

Overall Final Reclamation _____

Well Release on Active Location ☐Multi-Well Location ☐**Storm Water:**

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

Comment: [See "Comment #3" under "COGCC Comments" at the end of this report.](#)Corrective Action: [Comply with Rule 1002.f.\(2\)C. Ensure control measures are adequate for the site's conditions, have been installed in accordance with good engineering practices, and are maintained in proper functioning condition.](#)

Date: 07/26/2021

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

Comment	User	Date
<p>COMMENT #2</p> <p>Previous inspection observed an active leak occurring at the burner assembly of the produced water tank on the Location. Inspection required Operator to control and contain spills/releases and clean up per Rule 912.a; Remove and properly dispose of impacted fluids.- Comply with Rule 912 for Spills/Releases. Contact Area EPS for guidance.- Provide waste manifest documentation on a FIRR.</p> <p>It appears that the leak/spill identified within the 5/8/2023 inspection has been controlled and the tank repaired. However, a new active leak was observed at the other (northeastern) produced water tank's burner assembly. Operator representatives on Location were notified of the leak, to which they responded that they were aware of the spill. It is noted that Operator was not taking immediate action to control the spill in accordance with Rule 912.a. (1).</p> <p>Previous inspection also required Operator to remove and properly dispose of impacts; it was observed in this inspection that impacted materials remain apparent within the secondary containment berm; impacted materials have not been properly removed and disposed of.</p> <p>Inspection also required Operator to provide waste manifests to document proper disposal of impacts. Operator on-site indicated that impacted materials are currently being stored offsite in a truck "waiting for it to be full" before disposing, and therefore manifests don't exist at this time. However, Resolution #403489457 states that "spill was pumped into truck and back into tank to clean it. we then loaded onto truck and hauled to Great Divide Disposal, LLC".</p> <p>It is apparent that materials have not been properly disposed of, that Operator has failed to ensure good mechanical condition of Production facilities on site, and failed to implement appropriate spill prevention procedures and practices. This corrective action, including manifest requirements, will remain applicable.</p>	trujilloam	09/26/2023

COMMENT #1

trujilloam

09/26/2023

Inspection #702801510 observed new spills within the shed on the north end of the Location adjacent to a tank containing engine oil. Inspection required Operator to remove and properly dispose of impacted material at an approved Facility; provide waste manifest documentation on a FIRR; Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition; inspect at regular intervals and maintain in good mechanical condition per Rule 608.e; Implement or modify BMPs for improved material handling and spill prevention.

It was observed in this inspection that the spills appear to have been cleaned, however additional spills are apparent beneath the tank. Operator has failed to implement or modify BMPs for improved material handling and spill prevention, and has failed to maintain the tank in a good mechanical condition to prevent additional spills. Additionally, Operator has failed to provide waste manifests to document proper disposal of impacted soils.

CA remains applicable.

COMMENT #3

trujilloam

09/26/2023

Inspection #702801510 observed that stormwater management on the Location was inadequate; BMPs to stabilize/protect the cut and fill slopes and interim areas of the Location are missing or insufficient; rill erosion is widespread. Soils are bare and exposed and lack stabilization as seeding has largely failed. Erosion is resulting in offsite degradation to the south. Wattles to the south are not maintained and are now debris.

It was observed in this inspection that corrective actions to comply with Rule 1002.f have not been taken, or have been inadequate:

-BMPs were implemented to stabilize/protect the cut slopes using wood straw, however application was not uniform and areas of the slopes remain bare.

-Tracking has been implemented on western areas of the fill slope; BMP is no longer in proper functioning condition.

-Tracking appears to have only been implemented over the southern interim areas recently contoured; surface roughening over these areas appeared to be in proper functioning condition at time of inspection. However, BMPs remain missing or insufficient on the western interim areas of the Location; erosion issues observed.

-Wattles along the southern/western perimeter have not been maintained or removed.

Corrective actions have not been addressed in its entirety and remain applicable.

Attached Documents

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

Document Num	Description	URL
403542569	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6265061
696205277	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6265058
696205278	Active Leak at Tank	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6265059