



FIELD INSPECTION UNIT

The Field Inspection Unit (“FIU”) inspects oil and gas wells and related facilities (e.g., storage tanks, separators) to ensure compliance with Commission rules, polices, orders, and permits. The FIU also evaluates site reclamation after drilling is completed (interim reclamation), and after a well is plugged and abandoned or a location is ultimately closed (final reclamation). The FIU also has primary responsibility for responding to citizen complaints.

Unit Structure and Responsibilities

Staff Organization

The FIU has 28 full-time employees, including the Unit Manager. Five staff members specialize in site reclamation; the others are physical science/engineering technicians. The staff has an average of more than 26 years of oil and gas experience industry experience and 27% have an advanced degree.

The FIU is organized into four geographic regions and inspectors live within their assigned work region. Assigning inspectors to specific regions enhances inspectors’ working knowledge of regional distinctions in geology, environment and wildlife, operational practices, operators, and other stakeholders.

Inspection Process

COGCC inspects between 19,000 and 23,500 oil and gas facilities each year, including wells, tank batteries, and multi-operational locations. On average, active wells are inspected once every 2.4 years. This represents a 37% improvement since 2009 (average of 3.78 years).

Wells with reported problems are prioritized for re-inspection, which may result in multiple inspections of the same well in a short period of time. As a result, an average frequency of one inspection every three years does not guarantee that every well in the state is inspected during a three year timeframe, but does ensure that higher risk wells are inspected more frequently.

Field inspectors physically visit wells and production facilities and complete a field inspection report for each visit. The field inspection report is sent to the operator electronically, almost immediately after the inspection. Field inspectors may require an operator to take actions to correct minor instances of non-compliance and may refer more serious alleged violations to the Hearings Unit for enforcement.

FIELD INSPECTION UNIT OVERVIEW

Inspection goals are developed for each member of the field inspection group. The goal for each inspector varies according to well density and geographic features of the region to which they are assigned.

To assist in planning inspections and ensuring efficiency the OGCC utilizes a number of IT processes such as database reports, data queries, and a Geographic Information System. The IT tools use data from permitting, reporting, and field inspections to generate a list of inspections with the highest priority for inspection. For example, a well that has never been inspected has a higher priority than a recently inspected well with a satisfactory compliance evaluation.

Field inspectors have access to these tools through laptop computers that replicate COGCC's database through synchronization tools. In some areas, field inspectors use WI-FI for live access to the database. The field inspection report, mentioned above, is completed in the field and can be sent to the operator electronically.

Training

Field inspectors participate in rigorous and ongoing training to ensure they understand and remain up to date on rules, policies, and procedures. New inspectors receive two weeks of focused training to introduce them to the COGCC database, processes, and procedures. They work under close supervision for at least their first year in the field.

All inspectors are trained in stormwater management, well control, production equipment operation, sound survey equipment operation, dealing with difficult customers, and onsite safety. Inspectors also train regularly on technical and operational matters.

Reclamation Specialists

Five reclamation specialists focus on interim and final site reclamation, as well as stormwater compliance and educational outreach to the oil and gas community. The reclamation staff has extensive education and experience in restoration ecology and reclamation of disturbed lands. Like other inspectors, reclamation specialists are assigned a specific geographic region – there is one specialist in each of four regions, and one reclamation supervisor based in Denver. The regions vary in size based on the concentration of oil and gas facilities and activities.

UIC Inspection Program

The Underground Injection Control (“UIC”) program is part of the federal Safe Drinking Water Act. The Environmental Protection Agency has delegated authority for implementing the Class II UIC program (exploration and production waste injection and enhanced oil recovery wells) to the Commission.

FIELD INSPECTION UNIT OVERVIEW

The FIU conducts routine compliance inspections on over 900 UIC wells annually. The FIU also witnesses Mechanical Integrity Tests (“MITs”) on 25% of the UIC wells annually. If a UIC well fails an MIT, the inspector immediately orders the well to be shut-in and initiates an enforcement action. The inspector will conduct follow-up inspections and data review to ensure well integrity is restored or the well is plugged.

Intergovernmental Agency Inspector Program

The FIU works with local governments to implement an inspection program under an Intergovernmental Agreement. The FIU manager and supervisor serve as technical advisors for the hiring process.

A local government inspector receives initial training from COGCC and is issued equipment consistent with Commission field staff. The inspector is then assigned to a Commission field supervisor for assistance with technical aspects of inspections, if needed. Specific work tasks are assigned by the local government personnel responsible for monitoring the program.

Complaint Response

Field inspectors have primary responsibility for responding to citizen complaints. The Commission’s policy is to respond to all complaints within 48 hours; inspectors frequently respond in less than 12 hours.

Many complaints involve ephemeral issues (e.g., noise, odors) that must be witnessed and documented to provide appropriate mitigation. Multiple site visits frequently are required to observe the conditions giving rise to the complaints. Complaint resolution may involve multiple state and local governmental agencies.

Noise Complaints

- COGCC inspectors are trained to conduct noise surveys. A resident or the local government may request a noise survey to evaluate whether an operator is complying with the Commission’s noise regulations.
- Allowable noise levels depend on surrounding land use type, type of activity and time of day (nighttime allowable limits are more stringent). Readings are taken 350 feet from the noise source and 4 feet above ground.
- Oil and gas operators are required to mitigate equipment and activities if inspectors detect noise levels above allowable limits. Sound mitigation is most effective when implemented during the design and construction phases. Post-construction noise mitigation ranges from upgrading mufflers to installing artificial noise barriers.

FIELD INSPECTION UNIT OVERVIEW

Odor Complaints

- Field inspectors conduct an area search around a complainant's residence for nonspecific odor complaints.
- Emission control devices, tanks, separators, flow back tanks, pits, and spills are possible sources of odors, and are inspected individually.
- Flow back operations are evaluated to ensure that green completion equipment is used where required.