

**FORM  
INSP**Rev  
05/11**State of Colorado****Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
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Inspection Date:

11/20/2013

Document Number:

670600080

Overall Inspection:

**Violation****FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	
	<u>234897</u>	<u>317043</u>	<u>NOTO, JOHN</u>	2A Doc Num:	

**Operator Information:**

OGCC Operator Number:

Name of Operator: CM PRODUCTION LLCAddress: 600 17TH STREET #2800 SOUTHCity: DENVER State: CO Zip: 80202

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☐ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

Contact Name	Phone	Email	Comment
John Teff	303-534-0199	johnt@cmproductionllc.com	
LEONARD, MIKE		mike.leonard@state.co.us	
AXELSON, JOHN		john.axelson@state.co.us	
SCHURE, KYM		kym.schure@state.co.us	

**Compliance Summary:**

QtrQtr:	<u>SWNW</u>	Sec:	<u>11</u>	Twp:	<u>2N</u>	Range:	<u>49W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Unsatisfactory	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
10/02/2007	200120855	PR	PR	Satisfactory			No
09/23/2004	200060572	PR	PR	Unsatisfactory		Fail	Yes
04/13/2004	200052900	ES	PR	Unsatisfactory		Fail	Yes
10/20/2003	200045867	PR	PR	Satisfactory		Pass	No
09/25/1997	500158853	PR	PR			Pass	No
09/22/1997	500158852	CO	PR			Fail	Yes
10/03/1995	500158851	PR	PR			Pass	No

**Inspector Comment:**

Inspection to follow up on complaint, document #200390207, that asserted skim pits were buried in 2011 in violation of COGCC Rules and that a spill that occurred at vertical separator was not properly documented. Two skim pits visible on COGCC GIS 2009 aerial photos, not visible on 2011 aerial photos. Field visit verified pits are not present. COGCC does not have documentation for the Approx 10'x25' area with est. 20 cubic yards of oily soil on plastic liner. COGCC also has no documentation that skim pits were closed per COGCC rules, and no record of proper E&P waste disposal. CM Production is operator since 5/1/2010. NOAV will be prepared and forwarded COGCC Enforcement Officer

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
102613	PIT		09/23/1999		-	OLIVER-WARREN	
102616	PIT		09/23/1999		-	OLIVER-WARREN	
102617	PIT		09/23/1999		-	OLIVER-WARREN	
234897	WELL	PR	01/02/1996	OW	121-07039	OLIVER-WARREN 1	PR

**Equipment:**Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Motors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

**Location****Signs/Marker:**

Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date
BATTERY	Unsatisfactory	Tank size and content labeled, no NFPA labels on 300 bbl crude tanks, no labels on propane tank	Install sign to comply with rule 210.	01/10/2014

Emergency Contact Number: (S/U/V) Satisfactory

Corrective Date: 11/20/2013

Comment:

Corrective Action:

**Good Housekeeping:**

Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date
TRASH	Satisfactory			
WEEDS	Satisfactory			

**Spills:**

Type	Area	Volume	Corrective action	CA Date
Crude Oil	Treater	> 5 bbls	Approx 25'x10' stockpiled oily soil is evidence of spill. The oily soil is on deteriorating plastic liner. Oil stained soil also observed inside of treater bermed area. If spill was reportable, submit spill report (Form 19) by corrective action date. Remove and dispose or treat soil per COGCC rules provide transport and disposal documentation per COGCC Rules.	12/20/2013

☐ Multiple Spills and Releases?**Equipment:**

Type	#	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date

**Facilities:** ☐ New Tank Tank ID: \_\_\_\_\_

Contents	#	Capacity	Type	SE GPS

S/U/V:		Comment:	
Corrective Action:		Corrective Date:	

Paint

Condition	
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Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate			

Corrective Action		Corrective Date	
Comment			

Venting:

Yes/No	Comment

Flaring:

Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 234897

**Site Preparation:**

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/U/V:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:****S/U/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_**Wildlife BMPs:****S/U/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_**Stormwater:****Comment:** \_\_\_\_\_**Staking:****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:**Environmental****Spills/Releases:**

Type of Spill: OIL Description: Oily soil stored on plastic Estimated Spill Volume: 18

Comment: Oily soil staged on site, no documentaion of notification in COGCC records for spill and no doucmentation for land treatment.

Corrective Action: Provide information about origin of oily soil,submit Form 19 if from reportable spill. Date: 12/20/2013

Reportable: YES GPS: Lat 40.158567 Long -102.831681

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Inspector Name: NOTO, JOHN

Sample Location: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	Comment	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate	improperly stored oily waste on plastic sheeting on location,( see environmental section)		

**Complaint:**

Tracking Num	Category	Assigned To	Description	Incident Date
200390716	PITS	NOTO, JOHN	Former employee of CM Production, LLC contacted COGCC and said he was directed by CM Production, to bury two skim pits at the production facility. former employee indicated that no samples were collected, that E&P waste (oily) was in pit, no Form 27s filled out.	12/02/2013
200390716	SPILLS	NOTO, JOHN	J. Noto phone conversation with Mr. Parks on 11/25/13. A reportable spill from top of treater occurred in the spring of 2013. The oil was sucked up and oil contaminated soil was placed in a bermed area. COGCC does not have record of spill on a Form 19.	12/02/2013

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

1003a. Debris removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Unused or unneeded equipment onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Pit, cellars, rat holes and other bores closed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors marked? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: \_\_\_\_\_

Inspector Name: NOTO, JOHN

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

Production areas have been stabilized? \_\_\_\_\_

Segregated soils have been replaced? \_\_\_\_\_

#### RESTORATION AND REVEGETATION

##### Cropland

Top soil replaced \_\_\_\_\_

Recontoured \_\_\_\_\_

Perennial forage re-established \_\_\_\_\_

##### Non-Cropland

Top soil replaced \_\_\_\_\_

Recontoured \_\_\_\_\_

80% Revegetation \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment: \_\_\_\_\_

Overall Interim Reclamation \_\_\_\_\_

#### **Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_

Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

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 \_\_\_\_\_

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

S/U/V: \_\_\_\_\_ Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

CA: \_\_\_\_\_

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

Inspector Name: NOTO, JOHN

Pit Type: Skimming/Settling	Lined: _____	Pit ID: _____	Lat: _____	Long: _____
<b>Lining:</b>				
Liner Type: _____	Liner Condition: _____			
Comment: _____				
<b>Fencing:</b>				
Fencing Type: _____	Fencing Condition: _____			
Comment: _____				
<b>Netting:</b>				
Netting Type: _____	Netting Condition: _____			
Comment: _____				
Anchor Trench Present: _____	Oil Accumulation: _____	2+ feet Freeboard: _____		
Pit (S/U/V): <b>Violation</b>	Comment: Skim pits no longer present, low areas observed at approximate former pit locations			
Corrective Action: Provide closure documentation in accordance with COGCC Rules including Form 27 - Remediation Workplan for pit closure, laboratory results for compliance with COGCC Table 910-1, and transportation and disposal documentation.	Date: <b>03/01/2014</b>			

### Attached Documents

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

Document Num	Description	URL
670600081	sign and crude tank	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244795">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244795</a>
670600082	300 bbl tank battery	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244796">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244796</a>
670600083	300 bbl tank battery	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244797">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244797</a>
670600084	300 bbl tank battery	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244798">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244798</a>
670600085	oily soil on plastic liner	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244799">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244799</a>
670600086	oily soil on plastic liner	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244800">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244800</a>
670600087	vertical treater	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244801">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244801</a>
670600088	vertical treater	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244802">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244802</a>
670600089	vertical treater and propane tank	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244803">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244803</a>
670600091	oily soil staged at location	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244804">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244804</a>
670600092	produced water tank and pit	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244805">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244805</a>
670600093	produced water tank and former skim pit location	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244806">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244806</a>
670600094	former skim pit location	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244807">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244807</a>
670600097	2009 aerial photo showing skim pits	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244808">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244808</a>
670600135	2013 aerial photo - pits absent	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244809">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3244809</a>