

FORM INSP <small>Rev 05/11</small>	State of Colorado Oil and Gas Conservation Commission <small>1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109</small>		DE	ET	OE	ES
			Inspection Date: <u>11/20/2013</u>			
			Document Number: <u>670600080</u>			
			Overall Inspection: <div style="border: 2px solid red; padding: 2px; display: inline-block;">Violation</div>			
Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection		
	<u>234897</u>	<u>317043</u>	<u>NOTO, JOHN</u>	<input type="checkbox"/>	2A Doc Num: _____	

Operator Information:

OGCC Operator Number: _____

Name of Operator: CM PRODUCTION LLC

Address: 600 17TH STREET #2800 SOUTH

City: 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: SWNW Sec: 11 Twp: 2N Range: 49W

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 COCGG 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	<input type="checkbox"/>
102616	PIT		09/23/1999		-	OLIVER-WARREN	<input type="checkbox"/>
102617	PIT		09/23/1999		-	OLIVER-WARREN	<input type="checkbox"/>
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 Mortors: _____	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:		<input type="checkbox"/> New Tank	Tank ID: _____		
Contents	#	Capacity	Type	SE GPS	
S/U/V:		Comment:			
Corrective Action:				Corrective Date:	
Paint					
Condition					
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:

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: _____

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

Pit Type: Skimming/Settling Lined: _____ Pit ID: _____ Lat: _____ Long: _____

Lining:
 Liner Type: _____ Liner Condition: _____
 Comment: _____

Fencing:
 Fencing Type: _____ Fencing Condition: _____
 Comment: _____

Netting:
 Netting Type: _____ Netting Condition: _____
 Comment: _____

Anchor Trench Present: _____ Oil Accumulation: _____ 2+ feet Freeboard: _____

Pit (S/U/V): **Violation** 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: **03/01/2014**

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