

**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



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Inspection Date:
01/14/2014

Document Number:
670600199

Overall Inspection:

Violation

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	<input type="checkbox"/>
	<u>219791</u>	<u>312243</u>	<u>NOTO, JOHN</u>	2A Doc Num:	

Operator Information:

OGCC Operator Number:	
Name of Operator:	<u>CM PRODUCTION LLC</u>
Address:	<u>600 17TH STREET #2800 SOUTH</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>

- 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
SCHURE, KYM		kym.schure@state.co.us	
LEONARD, MIKE		mike.leonard@state.co.us	
AXELSON, JOHN		john.axelson@state.co.us	
TEFF, JOHN		johnt@cmproductionllc.com	

Compliance Summary:

QtrQtr:	<u>SENV</u>	Sec:	<u>33</u>	Twp:	<u>12N</u>	Range:	<u>54W</u>
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Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Unsatisfactory	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
01/08/2014	664001534	PR	PR	Unsatisfactory			No
07/08/2008	200192775	PR	PR	Satisfactory			No
12/06/2007	200123279	PR	PR	Satisfactory			No
06/05/2003	200039979	PR	PR	Satisfactory		Pass	No
01/25/1996	500153339	PR	PR			Pass	No

Inspector Comment:

Inspection conducted on 1/14/14 to assess damage from suspected produced water spills noted on Inspection #664001534 and to investigate a report to COGCC that oily waste was buried at the facility. COGCC noted berm erosion and apparent salt impacts on adjacent property. COGCC found buried oily waste near the south produced water pit at 40.97341 -103.42021. COGCC collected one sample of the oily waste and five soil samples which were submitted for analysis. Concentrations in the oily waste and soil samples were above 910-1 standards. A sample location map and results table are attached. No documentation on file at COGCC for spill notification or management/treatment of waste. Prepare a Sensitive Area Determination plan in accordance with Rule 901.e. to be submitted with a Form 27 by 3/14/2014. The Form 27 shall include proposed groundwater sampling locations, a sampling/analysis plan for soil and groundwater, and a plan to address buried oily waste. Form 15 Pit Reports for undocumented pits required by 3/14/2014. CM Productions is operator on record as of 10/1/2010.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
100570	PIT				-	CLIFF UNIT (RICE LEASE)		<input checked="" type="checkbox"/>
116281	PIT				-	RICE		<input checked="" type="checkbox"/>
219789	WELL	PR		OW	075-07216	RICE 2	PR	<input checked="" type="checkbox"/>

219791	WELL	PR	10/13/1994	OW	075-07221	RICE 3	PR	<input checked="" type="checkbox"/>
219792	WELL	PR		OG	075-07226	RICE 4	PR	<input checked="" type="checkbox"/>
436124	TANK BATTERY	AC			-	Rice Battery	AC	<input checked="" type="checkbox"/>

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

Emergency Contact Number: (S/U/V) _____ Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:				
Type	Area	Volume	Corrective action	CA Date
Produced Water		> 5 bbls	Stabilize and improve pit berms to prevent erosion and future spills. Prepare a Sensitive Area Determination plan in accordance with Rule 901.e. to be submitted with a Form 27 by 3/14/2014. The Form 27 shall include proposed groundwater sampling locations, a sampling/analysis plan for soil and groundwater, and a plan to address buried oily waste.	03/14/2014
Crude Oil			Buried oily waste found by COGCC during inspection. Provide Form 19 to COGCC with oil source, est quantities and cause. See produced water spill corrective action.	03/14/2014

Multiple Spills and Releases?

Equipment:					
Type	#	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date
Flow Line	1	Unsatisfactory	exposed flowline crosses drainage channel. Line is vulnerable to damage. Drainage would be impacted if line is damaged.	Insure compliance with Series 1102 Rules for pipeline operations, maintenance and repair.	02/28/2014

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					
Corrective Action				Corrective Date	
Comment					
Venting:					
Yes/No	Comment				
Flaring:					
Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date	

Predrill

Location ID: 219791

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:

Facility

Facility ID: 100570 Type: PIT API Number: - Status: _____ Insp. Status: _____

Facility ID: 116281 Type: PIT API Number: - Status: _____ Insp. Status: _____

Facility ID: 219789 Type: WELL API Number: 075-07216 Status: PR Insp. Status: PR

Facility ID: 219791 Type: WELL API Number: 075-07221 Status: PR Insp. Status: PR

Facility ID: 219792 Type: WELL API Number: 075-07226 Status: PR Insp. Status: PR

Facility ID: 436124 Type: TANK API Number: - Status: AC Insp. Status: AC

Environmental

Spills/Releases:

Type of Spill: WATER Description: produced water pits Estimated Spill Volume: _____

Comment: COGCC sample results and visibly impacted areas are evidence of produced water spills from pits.

Corrective Action: see spills section for corrective action Date: 03/14/2014

Reportable: YES GPS: Lat _____ Long _____

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	Other	Inadequate	oily soil from unknown source was buried at location without COGCC approval.	40.973410	- 103.420210

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 ? _____

Inspector Name: NOTO, JOHN

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: **Violation** Corrective Date: **02/28/2014**

Comment: **Same as noted on Inspection # 664001535, Natural drainage adjacent to produced water pit has been impacted by erosion and runoff from the facility**

CA: **install stormwater BMPs**

Pits: NO SURFACE INDICATION OF PIT

Pit Type: Produced Water Lined: NO Pit ID: 100571 Lat: 40.975324 Long: -103.416664

Lining:

Liner Type: _____ Liner Condition: _____

Comment: pit 100571 in COGCC database may be at facility, different operator, wrong coords, no pit permit in COGCC docs

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

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

Pit (S/U/V): _____ Comment: _____

Corrective Action: Submit Form 15, Pit Report with pit dimensions and coordinates Date: 03/14/2014

Pit Type: Produced Water Lined: NO Pit ID: 100570 Lat: 40.975324 Long: -103.416664

Lining:

Liner Type: _____ Liner Condition: _____

Comment: pit in COGCC database has wrong coords, no pit permit in COGCC docs

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

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

Pit (S/U/V): Unsatisfactory Comment: _____

Corrective Action: Submit Form 15, Pit Report with pit dimensions and coordinates Date: 03/14/2014

Pit Type: Produced Water Lined: NO Pit ID: 116281 Lat: 40.973494 Long: -103.418794

Lining:

Liner Type: _____ Liner Condition: _____

Comment: pit permit on file Doc #581014, this is east pit on COGCC GIS

Fencing:

Fencing Type: Livestock Fencing Condition: Adequate

Comment: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

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

Pit (S/U/V): Violation Comment: inadequate freeboard, erosion on outside wall into adjacent drainage.

Corrective Action: maintain and improve pit berms to prevent releases and erosion into drainage Date: 03/14/2014

Attached Documents

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

Document Num	Description	URL
670600225	CM Rice Sample Locations	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281171
670600226	COGCC Sample Results	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281172
670600227	COGCC Sample Chain of Custody	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281173
670600230	Sample HA-02 oily waste at approx 4 feet bgs	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281174
670600232	east produced water pit berm erosion into gully	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281175
670600234	north produced water pit facing south	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281176
670600235	erosion and apparent impacts below east produced w	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281177
670600236	East produced water pit facing east eroded berm	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281178
670600237	Sample location HA-02	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281179
670600238	Sample location HA-02	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281180
670600239	Erosion from east produced water pit into gully	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281181
670600240	Sample location SO-01	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281182
670600242	Southeast pit outer berm and pipe at gully	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281183
670600243	Background sample SO-02	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281184
670600245	outer berm above gully	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281185
670600246	Sample location SO-03	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281186
670600248	eroded and apparent salt impacted area adj to ber	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281187
670600249	Sample SO-04 location	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281188
670600251	Sample SO-05 location	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3281189