

FORM INSP <small>Rev 05/11</small>	State of Colorado				DE	ET	OE	ES	
	Oil and Gas Conservation Commission				Inspection Date: <u>04/04/2014</u>				
1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109				Document Number: <u>674300011</u>					
FIELD INSPECTION FORM				Overall Inspection: <u>Satisfactory</u>					
Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection					
	335244	335244	Spencer, Stan	<input type="checkbox"/>	2A Doc Num: _____				

Operator Information:

OGCC Operator Number: _____

Name of Operator: WPX ENERGY ROCKY MOUNTAIN LLC

Address: 1001 17TH STREET - SUITE #1200

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
Blaney, Karolina	(970) 683-2295	karolina.blaney@wpxenergy.com	Environmental Protection Specialist
FISCHER, ALEX		alex.fischer@state.co.us	
Gardner, Michael	(970) 263-2760	Michael.Gardner@wpxenergy.com	Environmental Manager

Compliance Summary:

QtrQtr: SESW Sec: 21 Twp: 6S Range: 94W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Unsatisfactory	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
01/29/2014	663902722			Satisfactory			No
07/03/2013	663801216			Satisfactory	I		No

Inspector Comment:

A site visit to the workover rig (WPX 045-22176) by Stan Spencer with Craig Burger on 4/4/14 in response to complaint by Bob Arrington (200401047). We spoke with Tony Franzone, (Drilling Eng.) and Justin Skalla (Supervisor). The incident occurred on 4/2. We were told that a leak in a downhole plug resulted in a burp half way up the mast which released a couple of gallons of water (this is probably what Mr. Arrington observed). Also they broke about five wet joints which may have released as much as 5bbl of PW (we later calculated a maximum of 1.78bbl based on string volume). The drip pan was not in place because of other equipment at the well head but a vac truck was on site and the water was immediately recovered. There was no evidence of petroleum staining or PW on the ground surface at the time of our visit. We told Tony that this was still a reportable spill and he said he'd contact Karolina Blaney or Mike Gardner to submit an F-19. I spoke with Karolina and Mike and requested a Form -19. They were not convinced that this was a reportable spill and asked me to confer with COGCC supervisory staff. I spoke with John Axelson who confirmed that this was reportable. I spoke again with Karolina on 4/9 and she agreed to submit an F-19. I also spoke with Shaun Kellerby and he said he had also visited the site, didn't observe any E&P release and that we could probably close the complaint (200401047). Mr. Arrington had also reported a tank overflow but WPX stated that none had occurred and what he had seen was probably cold methane gas venting from the flowback tank. I left a voicemail with Mr. Arrington telling him that we had investigated the site and to call me with any questions. (See Environmental for remainder)

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
211242	WELL	PR	12/19/1995	GW	045-07001	CLOUGH 2A	PR
270346	WELL	PR	05/18/2004	GW	045-09536	CLOUGH RWF 524-21	PR
270354	WELL	PR	06/01/2004	GW	045-09531	CLOUGH RWF 424-21	PR
270357	WELL	PR	05/30/2004	GW	045-09535	CLOUG RMV 219-21	PR
434764	WELL	WO	01/13/2014	LO	045-22176	Clough RWF 911-28D	WO

Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: <u>5</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: <u>2</u>	Separators: <u>4</u>	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: <u>2</u>	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
<input type="checkbox"/> Multiple Spills and Releases?				

Venting:	
Yes/No	Comment

Flaring:				
Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date

Predrill

Location ID: 335244

Site Preparation:
 Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/U/V: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:

Group	User	Comment	Date
OGLA	kubeczkd	<p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.</p> <p>Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.</p> <p>The access road will be maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.</p> <p>Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.</p> <p>Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.</p>	09/23/2013
OGLA	kubeczkd	<p>The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.</p> <p>Operator must submit an as-built drawing (plan view and cross-sections) of the injection well pad and associated equipment within 30 calendar days of construction.</p> <p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface or buried pipelines.</p> <p>Operator must implement best management practices to contain any unintentional release of fluids, including If the well is to be hydraulically stimulated, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.</p> <p>Operator will use qualified containment devices for all appropriate chemicals/hazardous materials used onsite during the operation of the injection well.</p> <p>All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure a minimum of 110 percent secondary containment for the largest structure containing fluids within each bermed area the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.</p> <p>Operator shall equip and maintain on all tanks an electronic level monitoring</p>	09/23/2013

		<p>device.</p> <p>Operator shall install a steel containment ring around tank batteries to provide secondary containment and install a synthetic liner that underlies the entire battery and is keyed into the top of the containment ring.</p> <p>Approval of this Form 2A does not authorize operator the right to inject. Authorization to inject into the selected Formation(s) requires approval of both the Form 31 and the Form 33.</p> <p>Before hydraulic stimulation of the each well, operator shall collect a groundwater sample from the Iles Formation and analyze for total dissolved solids (TDS); submit laboratory analytical results to denise.onyskiw@state.co.us and arthur.koelspell@state.co.us.</p> <p>Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to testing surface poly/steel or buried poly/steel pipelines.</p> <p>Operator must implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located.</p> <p>Operator must routinely inspect the entire length of the surface pipeline to ensure integrity. Operator shall conduct daily inspections of surface poly pipeline routes for leaks during active transfer of fluids. Inspections shall be conducted by viewing the length of the pipeline; operator will endeavor to minimize surface disturbance during pipeline monitoring. The operator shall maintain records of inspections, findings and repairs, if necessary, for the life of the pipelines.</p> <p>Operator must ensure appropriate secondary containment for volume of fluids that may be released before pump shut down from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings. Catchment basins, if needed, should be sized to contain the volume between pump stations or between the nearest pump station and the injection well pad being used for this well pad location. Pump stations along the surface poly or steel pipeline route will be continuously monitored when operating in order to swiftly respond to such a failure.</p> <p>Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.</p>	
OGLA	kubeczkd	<p>Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).</p> <p>As required for Groundwater Baseline Sampling; Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING.</p>	09/23/2013

S/UV: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

BMP Type	Comment
Interim Reclamation	<p>PRODUCTION/RECLAMATION BMP's</p> <ul style="list-style-type: none"> * Remove well pad and road surface materials that are incompatible with post-production land use and re-vegetation requirements * Use only certified weed-free native seed in seed mixes, except for non-native plants that benefit wildlife * WPX Energy will use certified, weed free grass hay, straw, hay or other mulch materials used for the reseeding and reclamation of disturbed areas. * Install exclusionary devices to prevent bird and other wildlife access to equipment stacks, vents and openings. * Reduce visits to well-sites through remote monitoring (i.e. SCADA) and the use of multi-function contractors.
Planning	<p>PLANNING BMP's</p> <ul style="list-style-type: none"> * Use existing roads where possible * Maximize use of remote telemetry for well monitoring to minimize traffic

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: DRILLING Description: Wet drill string Estimated Spill Volume: 1.78

Comment:

A site visit to the workover rig (WPX 045-22176) by Stan Spencer with Craig Burger on 4/4/14 in response to complaint by Bob Arrington (200401047). We spoke with Tony Franzone, (Drilling Eng.) and Justin Skalla (Supervisor). The incident occurred on 4/2. We were told that a leak in a downhole plug resulted in a burp half way up the mast which released a couple of gallons of water (this is probably what Mr. Arrington observed). Also they broke about five wet joints which may have released as much as 5bbl of PW (we later calculated a maximum of 1.78bbl based on string volume). The drip pan was not in place because of other equipment at the well head but a vac truck was on site and the water was immediately recovered. There was no evidence of petroleum staining or PW on the ground surface at the time of our visit. We told Tony that this was still a reportable spill and he said he'd contact Karolina Blaney or Mike Gardner to submit an F-19. I spoke with Karolina and Mike and requested a Form -19. They were not convinced that this was a reportable spill and asked me to confer with COGCC supervisory staff. I spoke with John Axelson who confirmed that this was reportable. I spoke again with Karolina on 4/9 and she agreed to submit an F-19. I also spoke with Shaun Kellerby and he said he had also visited the site, didn't observe any E&P release and that we could probably close the complaint (200401047). Mr. Arrington had also reported a tank overflow but WPX stated that none had occurred and what he had seen was probably cold methane gas venting from the flowback tank. I left a voicemail with Mr. Arrington telling him that we had investigated the site and to call me with any questions. Mr. Arrington responded with an email on April 8 as follows:Gentlemen, Wednesday, April 2, 2014 in the early afternoon, I was driving down I-70 when I observed a workover rig having an incident. This was located in the Rulison area in the production field South of the County landfill. That evening I called COGCC's Sean Kellerby (sp) and alerted him via recording. I reported this to the EAB board meeting on the next day, Thursday the 3rd and when I arrived home I was informed Sean had called. Calling Sean back, he related he had gone out to the site, but being nighttime could not see much of what had happened. As I understand, you went out to the site Friday, the 4th, and it was explained to you what had happened. Susan Alvilar of WPX also called me to explain the situation. She said this was work on an injection well and there was plug set and they were bring back up a section of pipe. She explained this was water related to the pipe section and only vapor was escaping from the "Baker" tank. She related they had about 2 bbls. come out and had a vacuum truck there to pick up the water. I told her that the view I had, showed the tank sputtering water that was running down the side as well as the vapor plumes shooting out. At the rig there was a water column going up about halfway on the tower and the plume was as wide as the tower. I related to her that it would be easy to estimate the column of water I observed flowing would have been "2 bbls." just what was in the air at any instant. Considering the tank was at overflow, it didn't appear their estimate of 2 bbls was very accurate and it might be good to double check what was happening. The fact they had a water column indicates it was under pressure and the pulsating flow indicated it was not under control by some action as uniform raising a pipe. No such pipe was visible either. Also, this was not "water" if an injection well. It would be very contaminated mixture of produced water and fracking water. Since it is being injected it means it is highly concentrated mixture of brines, chemicals, heavy metals and whatever hydrocarbon liquids. The vapors were not only water vapors, but had to include hydrocarbons. If you have a report form that I need to fill out, please let me know. But if they are planning a report of a 2 bbl. spill, we all know that the amount was greater than that. In the time I observed it of about 1/2 minute, it would have been close to 20 bbls plus whatever overrun the Baker tank. Bob Arrington60 Willow Creek Ct.Battlement mesa, CO 81635970-285-9757

Corrective Action: Date:

Reportable: GPS: Lat Long
 Proximity to Surface Water: Depth to Ground Water:

Water Well: Lat Long
 DWR Receipt Num: Owner Name: GPS :

Field Parameters:
 Sample Location:

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: RANGELAND
 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: 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 _____
 Comment: _____

Inspector Name: Spencer, Stan

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

COGCC Comments

Comment	User	Date
---------	------	------

<p>A site visit to the workover rig (WPX 045-22176) by Stan Spencer with Craig Burger on 4/4/14 in response to complaint by Bob Arrington (200401047). We spoke with Tony Franzone, (Drilling Eng.) and Justin Skalla (Supervisor). The incident occurred on 4/2. We were told that a leak in a downhole plug resulted in a burp half way up the mast which released a couple of gallons of water (this is probably what Mr. Arrington observed). Also they broke about five wet joints which may have released as much as 5bbl of PW (we later calculated a maximum of 1.78bbl based on string volume). The drip pan was not in place because of other equipment at the well head but a vac truck was on site and the water was immediately recovered. There was no evidence of petroleum staining or PW on the ground surface at the time of our visit. We told Tony that this was still a reportable spill and he said he'd contact Karolina Blaney or Mike Gardner to submit an F-19. I spoke with Karolina and Mike and requested a Form -19. They were not convinced that this was a reportable spill and asked me to confer with COGCC supervisory staff. I spoke with John Axelson who confirmed that this was reportable. I spoke again with Karolina on 4/9 and she agreed to submit an F-19.</p> <p>I also spoke with Shaun Kellerby and he said he had also visited the site, didn't observe any E&P release and that we could probably close the complaint (200401047). Mr. Arrington had also reported a tank overflow but WPX stated that none had occurred and what he had seen was probably cold methane gas venting from the flowback tank. I left a voicemail with Mr. Arrington telling him that we had investigated the site and to call me with any questions. Mr. Arrington responded with an email on April 8 as follows:</p> <p>Gentlemen,</p> <p>Wednesday, April 2, 2014 in the early afternoon, I was driving down I-70 when I observed a workover rig having an incident. This was located in the Rulison area in the production field South of the County landfill. That evening I called COGCC's Sean Kellerby(sp) and alerted him via recording. I reported this to the EAB board meeting on the next day, Thursday the 3rd and when I arrived home I was informed Sean had called. Calling Sean back, he related he had gone out to the site, but being nighttime could not see much of what had happened. As I understand, you went out to the site Friday, the 4th, and it was explained to you what had happened.</p> <p>Susan Alvilar of WPX also called me to explain the situation. She said this was work on an injection well and there was plug set and they were bring back up a section of pipe. She explained this was water related to the pipe section and only vapor was escaping from the "Baker" tank. She related they had about 2 bbls. come out and had a vacuum truck there to pick up the water.</p> <p>I told her that the view I had, showed the tank sputtering water that was running down the side as well as the vapor plumes shooting out. At the rig there was a water column going up about halfway on the tower and the plume was as wide as the tower. I related to her that it would be easy to estimate the column of water I observed flowing would have been "2 bbls." just what was in the air at any instant. Considering the tank was at overflow, it didn't appear their estimate of 2 bbls was very accurate and it might be good to double check what was happening. The fact they had a water column indicates it was under pressure and the pulsating flow indicated it was not under control by some action as uniform raising a pipe. No such pipe was visible either. Also, this was not "water" if an injection well. It would be very contaminated mixture of produced water and fracking water. Since it is being injected it means it is highly concentrated mixture of brines, chemicals, heavy metals and whatever hydrocarbon liquids. The vapors were not only water vapors, but had to include hydrocarbons.</p> <p>If you have a report form that I need to fill out, please let me know. But if they are planning a report of a 2 bbl. spill, we all know that the amount was greater than that. In the time I observed it of about ½ minute, it would have been close to 20 bbls plus whatever overrun the Baker tank.</p> <p>Bob Arrington 60 Willow Creek Ct. Battlement mesa, CO 81635 970-285-9757</p>	<p>spencers</p>	<p>04/10/2014</p>
---	-----------------	-------------------