

Inspector Name: Waldron, Emily

**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:
04/13/2015Document Number:
673402006

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	418818	418821	Waldron, Emily	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 90450Name of Operator: TRUE OIL LLCAddress: P O BOX 2360City: CASPER State: WY Zip: 82601

- ☒ 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
santo, john	(307) 237-9301	john.santo@truecos.com	
Kellerby, Shaun		shaun.kellerby@state.co.us	

Compliance Summary:

QtrQtr:	NESW	Sec:	15	Twp:	6N	Range:	89W
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
09/02/2014	673401065	PR	PR	ACTION REQUIRED			No
10/25/2013	673400040	PR	PR	ACTION REQUIRED	F		No
07/27/2012	669300002	PR	SI	ACTION REQUIRED	F		No
05/11/2012	662300486	PR	PR	ALLEGED VIOLATION	F		Yes
11/14/2011	662300016	XX	WO	ALLEGED VIOLATION			Yes
05/17/2011	200314592	PR	WO	SATISFACTORY			No
01/03/2011	200290744	DG	DG	SATISFACTORY			No

Inspector Comment:**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
418818	WELL	PR	12/27/2011	OW	107-06240	Breeze Unit 23-15	SI

Equipment:Location Inventory

Special Purpose Pits: _____	Drilling Pits: <u>1</u>	Wells: <u>1</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: <u>1</u>	Separators: _____	Electric Motors: _____
Gas or Diesel Mortors: <u>1</u>	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: <u>1</u>
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: <u>1</u>	Oil Tanks: <u>2</u>	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: <u>1</u>	Fuel Tanks: _____

Location**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED	Tank does not have NFPA diamond.	Install sign to comply with rule 210.	04/13/2015
BATTERY	SATISFACTORY	At entrance.		
WELLHEAD	ACTION REQUIRED	No wellhead sign.	Install sign to comply with rule 210.	04/13/2015

Emergency Contact Number (S/A/V): SATISFACTORY

Corrective Date: _____

Comment: On tank only. 307-237-9301

Corrective Action: _____

Good Housekeeping:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
DEBRIS	ACTION REQUIRED	Silt fence around perimeter.	Keep location free from trash and debris.	05/13/2015
WEEDS	ACTION REQUIRED	Annual weeds on location.	Implement a weed control program.	04/13/2015

Spills:

Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

Equipment:

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Plunger Lift	1	SATISFACTORY			
Deadman # & Marked	4	SATISFACTORY			

Facilities:☐ New Tank

Tank ID: _____

Contents	#	Capacity	Type	SE GPS
CRUDE OIL	1	400 BBLS	HEATED STEEL AST	40.473290,-107.362830

S/A/V: SATISFACTORY

Comment: _____

Corrective Action: _____

Corrective Date: _____

Paint

Condition	Adequate
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Other (Content) _____

Other (Capacity) _____

Other (Type) _____

Berms

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

Corrective Action _____

Corrective Date _____

Comment _____

Venting:	
Yes/No	Comment
NO	

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 418818

Site Preparation:

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

S/A/V: _____

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

Form 2A COAs:

Group	User	Comment	Date
Agency	kubeczkod	Operator must implement best management practices to contain any unintentional release of fluids.	08/06/2010
Agency	kubeczkod	Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.	08/06/2010
Agency	kubeczkod	Location may be in a sensitive area because of the potential for shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.	08/06/2010
Agency	kubeczkod	Location may be in a sensitive area because of the potential for shallow groundwater; therefore production pits must be lined.	07/16/2010
Permit	edelenr	Before placing oil/salt based muds in the pit, operator must file and receive prior approval of a Pit Permit, Form 15, COGCC regulations regarding pit permits can be found Rule 903.a.(3). PIT PERMITTING/REPORTING REQUIREMENTS.	08/17/2010

S/A/V: SATISFACTORY **Comment:** _____**CA:** _____ **Date:** _____**Wildlife BMPs:****S/A/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:

Inspector Name: Waldron, Emily

Landman Name: _____	Phone Number: _____
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____
Request LGD Attendance: _____	
<u>LGD Contact Information:</u>	
Name: _____	Phone Number: _____ Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>	
<u>Summary of Operator Response to Landowner Issues:</u>	
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>	

Facility

Facility ID: 418818 Type: WELL API Number: 107-06240 Status: PR Insp. Status: SI

Idle Well

Purpose: ☒ Shut In ☐ Temporarily Abandoned Reminder: _____
S/A/V: SATISFACTORY CA Date: _____
CA: _____
Comment: _____

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____
Comment: _____
Corrective Action: _____ Date: _____
Reportable: _____ 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: _____

Complaint:

Tracking Num	Category	Assigned To	Description	Incident Date
200331374	PITS	Neidel, Kris	pit is still open from drilling.	12/01/2011
200331374	STORMWA TER BMPs	Neidel, Kris	topsoil stock pile is just off the pad, there are no BMP's in place to keep soil from washing away.	12/01/2011
200331374	TRASH	Neidel, Kris	3 bottles filled with oil on location, they are assumed to be trash. There is a bag of trash	12/01/2011

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: **No interim reclamation apparent.**1003a. Debris removed? **Fail** CM **Silt fence around perimeter.**CA **Remove or maintain.**CA Date **05/13/2015**Waste Material Onsite? **Fail** CM **Silt fence around perimeter.**CA **Remove or maintain.**CA Date **05/13/2015**Unused or unneeded equipment onsite? **Pass** CM _____

CA _____

CA Date _____

Pit, cellars, rat holes and other bores closed? **Pass** CM _____

CA _____

CA Date _____

Guy line anchors removed? _____ CM _____

CA _____

CA Date _____

Guy line anchors marked? **Pass** CM _____

CA _____

CA Date _____

1003b. Area no longer in use? **Fail**Production areas stabilized ? **Pass**

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? **Fail**

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: **Pit area has weeds growing on it. No evidence of seeding. Area to east of tank has no seeding, vegetation or erosion controls at the top of the slope.**Overall Interim Reclamation **Fail****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 _____

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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
Compaction	Fail					Weeds growing on location.
Berms	Pass					
Seeding	Fail					No seeding apparent. Weeds only vegetation.
Gravel	Fail					Weeds growing on location.

S/A/V: **ACTION REQUIRED** Corrective Date: **05/13/2015**

Comment: **Rills coming onto location from the southeast. Silt fence left as debris around location perimeter. No BMP maintenance apparent.**

CA: **A stormwater plan utilizing appropriate and necessary BMPs shall be installed and maintained to prevent the migration of soil on pad, access roads and interim reclamation area. BMPs shall prevent site degradation from potential spills and/or releases from stored materials and equipment.**

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Follow up to inspection from 9/2/2014 (document number 673401065). Several items remain out of compliance. Inspection is being referred for enforcement.	waldrone	04/13/2015

Attached Documents

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

Document Num	Description	URL
673402011	Inspection Photos 04132015	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3589280

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)