

Inspector Name: Hughes, Jim

**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

Inspection Date:  
08/18/2015Document Number:  
674900730

Overall Inspection:

**ACTION REQUIRED****FIELD INSPECTION FORM**

|                     |             |        |                 |                          |             |
|---------------------|-------------|--------|-----------------|--------------------------|-------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name: | On-Site Inspection       | 2A Doc Num: |
|                     | 215826      | 326076 | Hughes, Jim     | <input type="checkbox"/> |             |

**Operator Information:**OGCC Operator Number: 10000Name of Operator: BP AMERICA PRODUCTION COMPANYAddress: 501 WESTLAKE PARK BLVDCity: HOUSTON State: TX Zip: 77079

- ☐ 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         |
|------------------|--------------|-------------------------------|-----------------|
| Beebe, Sabre     | 970-375-7530 | Sabre.Beebe@bp.com            | SW Insp Reports |
| SW, BP           |              | SanJuanCOGCC@bp.com           | SW Insp Reports |
| Fischer, Alex    |              | alex.fischer@state.co.us      |                 |
| Kampf, Brenna    |              | brenna.kampf@co.laplata.co.us |                 |
| Labowskie, Steve |              | steve.labowskie@state.co.us   |                 |

**Compliance Summary:**QtrQtr: NWSE Sec: 4 Twp: 34N Range: 7W

| Insp. Date | Doc Num   | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 04/10/2015 | 674601757 | PR         | PR          | SATISFACTORY                  | I        |                | No              |
| 01/03/2013 | 669400349 | PR         | PR          | <b>ACTION REQUIRED</b>        | I        |                | No              |
| 05/18/2006 | 200093289 | PR         | PR          | SATISFACTORY                  |          | Pass           | No              |
| 06/07/2004 | 200057888 | PR         | PR          | SATISFACTORY                  |          | Pass           | No              |
| 05/08/2003 | 200041002 | PR         | PR          | SATISFACTORY                  |          | Pass           | No              |
| 10/18/2001 | 200022926 | PR         | PR          | SATISFACTORY                  |          | Pass           | No              |
| 07/15/1999 | 500149571 | PR         | PR          |                               |          | Pass           | No              |
| 11/18/1997 | 500149570 | PR         | PR          |                               |          | Pass           | No              |
| 11/21/1996 | 500149569 | PR         | PR          |                               |          | Pass           | No              |
| 08/11/1995 | 500149568 | PR         | PR          |                               |          |                | No              |

**Inspector Comment:**

On August 18, 2015 COGCC SW EPS Jim Hughes conducted an environmental field inspection of the BP Smith A #1. During a meeting between COGCC SW EPS and the operator on August 11, 2015 an on-site visit with the operator was requested. BP company representative, Tankard Floyd, was on site to discuss potential storm water concerns. For the most recent field inspection report of this facility, please refer to document #674601757. All corrective actions noted within this inspection were discussed with the operator.

**Related Facilities:**

Inspector Name: Hughes, Jim

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |                                     |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|-------------------------------------|
| 215826      | WELL | PR     | 03/01/1990  | GW         | 067-07431 | SMITH A 1     | EI          | <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 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****Lease Road:**

| Type   | Satisfactory/Action Required | comment | Corrective Action | Date |
|--------|------------------------------|---------|-------------------|------|
| Main   | SATISFACTORY                 |         |                   |      |
| Access | SATISFACTORY                 |         |                   |      |

**Signs/Marker:**

| Type                 | Satisfactory/Action Required | Comment                                    | Corrective Action | CA Date |
|----------------------|------------------------------|--|-------------------|---------|
| TANK LABELS/PLACARDS | SATISFACTORY                 | Free standing sign near PBV.               |                   |         |
| WELLHEAD             | SATISFACTORY                 | Free standing sign near location entrance. |                   |         |

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

Corrective Date: \_\_\_\_\_

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

Corrective Action: \_\_\_\_\_

**Spills:**

| Type | Area | Volume | Corrective action | CA Date |
|------|------|--------|-------------------|---------|
|------|------|--------|-------------------|---------|

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

| Type                      | # | Satisfactory/Action Required | Comment   | Corrective Action | CA Date |
|---------------------------|---|------------------------------|-----------|-------------------|---------|
| Deadman # & Marked        | 4 | SATISFACTORY                 |           |                   |         |
| Ancillary equipment       | 1 | SATISFACTORY                 | Telemetry |                   |         |
| Bird Protectors           | 1 | SATISFACTORY                 |           |                   |         |
| Gas Meter Run             | 1 | SATISFACTORY                 |           |                   |         |
| Vertical Heated Separator | 1 | SATISFACTORY                 |           |                   |         |

**Facilities:**☐ New Tank

Tank ID: \_\_\_\_\_

| Contents       | # | Capacity  | Type      | SE GPS                |
|----------------|---|-----------|-----------|-----------------------|
| PRODUCED WATER | 1 | <100 BBLS | PBV STEEL | 37.240916,-107.638782 |

S/A/V: SATISFACTORY

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

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|                    |          |                     |                     |                 |  |
|--------------------|----------|---------------------|---------------------|-----------------|--|
| Corrective Action: |          | Corrective Date:    |                     |                 |  |
| <b>Paint</b>       |          |                     |                     |                 |  |
| Condition          | Adequate |                     |                     |                 |  |
| Other (Content)    |          |                     |                     |                 |  |
| Other (Capacity)   | 95 bbl.  |                     |                     |                 |  |
| Other (Type)       |          |                     |                     |                 |  |
| <b>Berms</b>       |          |                     |                     |                 |  |
| Type               | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance     |  |
| Metal              | Adequate | Walls Sufficient    | Base Sufficient     | Adequate        |  |
| Corrective Action  |          |                     |                     | Corrective Date |  |
| Comment            |          |                     |                     |                 |  |

|                 |         |  |
|-----------------|---------|--|
| <b>Venting:</b> |         |  |
| Yes/No          | Comment |  |
|                 |         |  |

|                 |                              |         |                   |         |
|-----------------|------------------------------|---------|-------------------|---------|
| <b>Flaring:</b> |                              |         |                   |         |
| Type            | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|                 |                              |         |                   |         |

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**Predrill**

Location ID: 215826

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **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:**

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: 215826 Type: WELL API Number: 067-07431 Status: PR Insp. Status: EI

**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:**

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|   |             |       |                         |
|---|-------------|-------|-------------------------|
| DWR Receipt Num:  | Owner Name: | GPS : | Lat _____<br>Long _____ |
| <b>Field Parameters:</b>  |             |       |                         |
| 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: _____                         |   |
| 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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Berms            | Fail            | Compaction              | Pass                  |               |                          |         |
| Compaction       | Pass            | Culverts                | Pass                  |               |                          |         |

S/A/V: **ACTION REQUIRED** Corrective Date: **09/21/2015**Comment: **Location berm has been breached on south side of location. Location berm has failed in the southwest corner.**CA: **Maintain/install BMPs to address storm water run off.**Pits: ☒ NO SURFACE INDICATION OF PIT**COGCC Comments**

| Comment  | User    | Date       |
|--|---------|------------|
| On August 18, 2015 COGCC SW EPS Jim Hughes conducted an environmental field inspection of the BP Smith A #1. During a meeting between COGCC SW EPS and the operator on August 11, 2015 an on-site visit with the operator was requested. BP company representative, Tankard Floyd, was on site to discuss potential storm water concerns. For the most recent field inspection report of this facility, please refer to document #674601757. All corrective actions noted within this inspection were discussed with the operator. Operator noted that during corrective action work, the northern location diversion berm would be cleaned out/reinforced. This BMP is currently functioning properly. Operator noted that sunflowers along access road have recently been sprayed. Most recent inspection from April 2015 indicates that operator has repaired location berm previously. | hughesj | 08/19/2015 |

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

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| Document Num | Description   | URL   |
|--------------|---|---|
| 674900731    | Location berm has failed on south edge of location. | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665607">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665607</a> |
| 674900732    | Location berm has failed in SW corner of location.  | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665608">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665608</a> |
| 674900733    | Location berm on N side of location.                | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665609">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3665609</a> |

## **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.)