

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

10/17/2017

Submitted Date:

10/26/2017

Document Number:

681700927**FIELD INSPECTION FORM**
 Loc ID 331795 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10112Name of Operator: FOUNDATION ENERGY MANAGEMENT LLCAddress: 5057 KELLER SPRINGS RD STE 650City: ADDISON State: TX Zip: 75001**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:39 Number of Comments29 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
Sutphin, Dirk		dirk.sutphin@state.co.us	
Stone, Andrew		andrewg.stone@state.co.us	RE: MIT requirements
,		dnr_cogccengineering@state.co.us	
Allison, Rick		rick.allison@state.co.us	
Leonard, Mike		mike.leonard@state.co.us	
Contact, General		regulatory@foundationenergy.com	All inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
266038	WELL	PR	05/19/2003	OW	123-21315	WICKSTROM 6-5	EI

General Comment:

COGCC environmental inspection of well, tank battery, and pit. Follow-up to 8/28/2017 Field Inspection Report (doc #678800393), Remediation Project #1834, and NOAV #1126686. Where corrective actions from previous inspection reports remain unresolved, original corrective action dates remain.

Disassembly of pump jack and absence of prime mover may render well incapable of production and thereby Temporarily Abandoned as opposed to Shut-In, per 100-series definitions, although well is equipped with a plunger lift. Production records indicate that well has been shut-in since April 2016. There are no MITs on-record for this well in the COGCC database. Contact COGCC engineering to discuss well status and MIT requirements.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	NFPA placard on skim tank is adequate, but skim tank lacks volume label.		
Corrective Action:	Install sign to comply with Rule 210.d.	Date:	12/26/2017
Type	BATTERY		
Comment:	Sign at tank battery only lists Wickstrom 6-12, which was incapable of production on date of inspection, and emergency contact number for operator is partially obscured. Signs for Wickstrom 6-4 & 6-5 are attached to separator/treater sheds. See photos.		
Corrective Action:	Install sign to comply with Rule 210.b.	Date:	11/26/2017
Type	WELLHEAD		
Comment:	No sign at wellhead.		
Corrective Action:	Install sign to comply with Rule 210.b.	Date:	11/26/2017
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Southernmost horizontal heater treater surrounded by debris/remains of former shed does not appear to be in use, neither does pump jack. See photos.		
Corrective Action:	Comply with Rule 603.f .	Date:	01/26/2018
Type	STORAGE OF SUPL		
Comment:	Rusty 55-gallon drum full of fluid east of 300 bbl crude oil ASTs. See photos.		
Corrective Action:	Comply with Rule 603.f .	Date:	11/26/2017
Type	DEBRIS		
Comment:	Accumulation of junk, debris, and wind-blown weeds beneath pump jack. Junk and debris at former treater shed south of two existing sheds. See photos.		
Corrective Action:	Comply with Rule 603.f .	Date:	11/05/2017
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Crude Oil	Flow Line	<= 1 bbl	
Comment:	Localized, oil-stained soil beneath southern 2" flowline riser on east side of 400-bbl crude oil ASTs. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.		Date: 10/28/2017
Crude Oil	Separator	<= 1 bbl	
Comment:	Historical accumulations of oil-stained soil inside of Wickstrom #6-5 treater shed. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.		Date: 10/28/2017
Crude Oil	WELLHEAD	<= 1 bbl	
Comment:	Historical accumulation of localized, oil-stained soil beneath wellhead, flowline riser, and day tank immediately south of wellhead. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.		Date: 10/28/2017

Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath valves on north and south sides of 300-bbl and 400-bbl crude oil ASTs.			
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date: <u>10/28/2017</u>
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil and oily-weeds at skim tank outlet. See photos.			
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date: <u>10/28/2017</u>
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath production tank loadline, as indicated in previous Field Inspection Report. See photos.			
Corrective Action:	Immediately remove and properly dispose of oily waste, per Rule 907.e			Date: <u>08/29/2017</u>

In Containment: No

Comment: ☒ Multiple Spills and Releases?

Equipment:				corrective date
Type: Vertical Separator	# 2			
Comment:	Separator conditions inside of Wickstrom #6-4 shed are satisfactory. Historical accumulations of oily waste inside of Wickstrom #6-5 shed. See photos.			
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.			Date: <u>11/26/2017</u>
Type: Emission Control Device	# 1			
Comment:	ECD south of treater/separator shed for Wickstrom #6-5.			
Corrective Action:				Date:
Type: Gas Meter Run	# 2			
Comment:	Conditions of gas meters inside of Wickstrom #6-4 shed and west of #6-5 shed are satisfactory.			
Corrective Action:				Date:
Type: Pump Jack	# 1			
Comment:	Pump jack is disassembled. See photos.			
Corrective Action:	Contact COGCC Production Analysts to discuss well status update requirements.			Date: <u>11/05/2017</u>
Type: Vertical Heater Treater	# 2			
Comment:	Treater conditions inside of Wickstrom #6-4 shed are satisfactory. Historical accumulations of oily waste inside of Wickstrom #6-5 shed. See photos.			
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.			Date: <u>11/26/2017</u>
Type: Flow Line	# 1			
Comment:	NOT IN USE: Bullplugged 2" flowline riser south of westernmost 300 bbl crude oil AST. See photos.			
Corrective Action:	Contact the Engineering Integrity section to discuss flowline abandonment requirements per Rule 1103. Along with the rule, the COGCC Operator Guidance, Rules 1101, 1102, and 1103: Flowline Guidance 1101 and 1102 guidance document can provide further details. Contact dnr_cogccengineering@state.co.us with resolution plan.			Date: <u>11/05/2017</u>
Type: Flow Line	# 2			
Comment:	NOT IN USE: Two bullplugged 2" steel flowline risers east of 300 bbl crude oil ASTs. See photos.			

Corrective Action:	Contact the Engineering Integrity section to discuss flowline abandonment requirements per Rule 1103. Along with the rule, the COGCC Operator Guidance, Rules 1101, 1102, and 1103: Flowline Guidance 1101 and 1102 guidance document can provide further details. Contact dnr_cogccengineering@state.co.us with resolution plan.		Date:	11/05/2017
Type: Bird Protectors	# 2			
Comment:				
Corrective Action:			Date:	
Type: Ancillary equipment	# 1			
Comment:	Day tank at southeast corner of pump jack lacks secondary containment device. See photos.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 906.d.(1).		Date:	11/26/2017
Type: Flow Line	# 1			
Comment:	Historical accumulation of oily waste beneath flowline riser south of wellhead. See photos.			
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.		Date:	11/26/2017
Type: Plunger Lift	# 1			
Comment:				
Corrective Action:			Date:	
Type: Flare	# 1			
Comment:	Gas flare south of skim tank and produced water pit is plumbed to 1" and 2" flowline risers. See photos.			
Corrective Action:			Date:	
Type: Flow Line	# 2			
Comment:	IN USE: Two 2" steel flowline risers on east side of 400 bbl crude oil ASTs were plumbed to pump at SE corner of tank battery on date of inspection. See photos.			
Corrective Action:			Date:	
Type: Flow Line	# 2			
Comment:	IN USE: 1" and 2" flowline risers plumbed to gas flare. See photos.			
Corrective Action:			Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	OTHER	PBV FIBERGLASS		
Comment:	Skim tank outlet to evaporation pit is disassembled. Localized, oil-stained soil beneath disassembled outlet. See photos.				
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				Date: 11/26/2017

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient		Inadequate

Comment:	Earthen berm shared with produced water pit. Skim tank lacks earthen berms on north, west, and south sides. See photos.				
Corrective Action:	Install berms or other secondary containment devices per Rule 605.a.(4).				
Date:	11/26/2017				
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	400 BBLs	STEEL AST		,
Comment:	Localized, historical accumulations of oily waste beneath valves on north and south sides of tanks. See photos.				
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				
Date:	11/26/2017				

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Insufficient		Inadequate	
Comment:	Earthen berms shared by 300-bbl and 400-bbl crude oil ASTs are eroded and shallow. See photos.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).				
Date:	11/26/2017				
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	3	300 BBLs	STEEL AST		,
Comment:	Localized, historical accumulations of oil-stained soil beneath valves on north and south sides of tanks. West tank does not appear to be in use, based on bullplugged valve and flowline riser on south side of tank. See photos.				
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				
Date:	11/26/2017				

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Insufficient		Inadequate
Comment:	Earthen berms shared by 300-bbl and 400-bbl crude oil ASTs are eroded and shallow. See photos.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			
Date:	11/26/2017			

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	Field Flare
Comment:	Inactive gas flare plumbed to active flowlines SW of produced water pit. See photos.

Corrective Action:	Contact COGCC engineering unit to discuss flaring requirements under Rule 912.	Date:	11/09/2017
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Environmental

Spill/Remediation:

Comment: Previous operator had approval to burn and stockpile oily waste under Remediation Project #1834 with the condition that a sample be collected from base of pit, per corrective actions proscribed by NOAV #1126686 (attached). Remediation project remains active, confirmation samples and disposal manifests were never submitted to COGCC.

Corrective Action: Remit records of work performed under Remediation Project #1834 or contact EPS Steven Arauza to discuss closure requirements.

Date: 11/05/2017

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Corrective Action: Date: **Pits:** ☐ NO SURFACE INDICATION OF PITType: Produced WaterLined: NOPit ID: 273445Lat: 40.611286Long: -104.025510Reference Point: Other: Length: 30Width: 25**Lining:**Liner Type: Liner Condition: Comment: No linerCorrective Action: Date: c**Fencing:**Fencing Type: Fencing Condition: Comment: No fenceCorrective Action: Date: **Netting:**Netting Type: MeshNetting Condition: GapsComment: Gaps in mesh around perimeter of pit are large enough to allow wildlife access, as indicated in previous Field Inspection Report. See photos.Corrective Action: Date: 09/03/2017Anchor Trench Present: NOOil Accumulation: YES2+ feet Freeboard: YESComment: Oil-stained soil on pit berm underlying inlet from skim tank. See photos.Corrective Action: Date: 10/28/2017**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
681700940	Site investigation and remediation workplan	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4284868
681700941	NOAV with sampling requirement	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4284869
681700942	Previous Field Inspection Report	insp_678800393.pdf
681700943	Field photos.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4284870