

**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:

01/04/2018

Submitted Date:

01/04/2018

Document Number:

678800474

**FIELD INSPECTION FORM**

Loc ID 443507 Inspector Name: LEONARD, MIKE On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 10542  
Name of Operator: CUB CREEK ENERGY  
Address: 200 PLAZA DRIVE SUITE 100  
City: HIGHLANDS State: CO Zip: 80129

**Findings:**

- 30 Number of Comments
- 14 Number of Corrective Actions
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
		dnr_cogccengineering@state.co.us	
Burn, Diana		diana.burn@state.co.us	
		dnr_cogccenforcement@state.co.us	
Baily, Scott		scott.baily@cub-creek.com	
Canfield, Chris		chris.canfield@state.co.us	
Noto, John		john.noto@state.co.us	
Gardner, Bob		bob.gardner@cub-creek.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
443498	WELL	PR	11/01/2016	LO	123-42254	VAIL 5	PR
443499	WELL	PR	11/01/2016	LO	123-42255	VAIL 4	PR
443500	WELL	PR	11/01/2016	LO	123-42256	VAIL 1	PR
443502	WELL	PR	11/01/2016	LO	123-42257	VAIL 2	PR
443503	WELL	PR	11/01/2016	LO	123-42258	VAIL 6	PR
443504	WELL	PR	11/01/2016	LO	123-42259	VAIL 9	PR
443505	WELL	PR	11/01/2016	LO	123-42260	VAIL 8	PR
443506	WELL	PR	11/01/2016	LO	123-42261	VAIL 7	PR
443507	LOCATION	AC			-	Vail Pad	AO
443508	WELL	PR	11/01/2016	LO	123-42262	VAIL 3	PR

**General Comment:**

Inspection performed in response to public complaint COGCC Document # 200445008.

Location			
<b>Lease Road:</b>			
Type	Main		
comment:	Access off of Hwy 60		
Corrective ActionL			Date:
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	CONTAINERS		
Comment:	No Label on methanol container at meter runs. See attached photo #34		
Corrective Action:	Install sign to comply with Rule 210.d.		Date: 02/04/2018
Type	WELLHEAD		
Comment:	No wellhead signs on any of the 9 wells as required by Rule 210 b. " Wells. Within sixty (60) days after the completion of a well, a permanent sign shall be located at the wellhead which shall identify the well and provide its legal location, including the quarter quarter section. When no associated battery is present, the additional information required under Rule 210.b.(2) shall be required on the sign. See attached Photo #8		
Corrective Action:	Install sign to comply with Rule 210.b.		Date: 03/04/2018
Type	BATTERY		
Comment:	Adequate		
Corrective Action:			Date:
Type	TANK LABELS/PLACARDS		
Comment:	Buried sump has capacity labeling but has no content label or NFPA label. See attached photo		
Corrective Action:	Install sign to comply with Rule 210.d.		Date: 03/04/2018
<b>Emergency Contact Number:</b>			
Comment:	Adequate		
Corrective Action:			Date: _____
<b>Good Housekeeping:</b>			
Type	DEBRIS		
Comment:	Misc well equipment strewn on ground at Vail # 9 See attached photo#8		
Corrective Action:	Comply with Rule 603.f .		Date: 01/16/2018
Type	TRASH		
Comment:	Trash and damaged oily bucket on north side of ECD, steel bucket 1/2 full of fluid see attached photos 45 and 46		
Corrective Action:	Comply with Rule 603.f .		Date: 01/16/2018
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
Crude Oil	WELLHEAD	<= 1 bbl	
Comment:	Stained soil at Vail # 1 wellhead		
Corrective Action:	Remove or remediate		Date: 02/04/2018
Crude Oil	Tank	>= 5 bbls	
Comment:	Oily gravel with free product in tank containment see photos 17-31		

Corrective Action:	Remove free fluids and contact COGCC EPS staff per Rule 906.b. within 2 business days of receipt of inspection. Remove free product within 24 hours	Date:	01/09/2018
Crude Oil	<= 1 bbl		
Comment:	Stained soil at combustor knockout seee photos 39-43		
Corrective Action:	Remove or remediate soils	Date:	02/04/2018
Crude Oil	>= 5 bbls		
Comment:	Oily gravel in lined area on pad. free product present see photo 16		
Corrective Action:	Remove free fluids and contact COGCC EPS staff per Rule 906.b. within 2 business days	Date:	01/09/2018

In Containment: No

Comment:

Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	WELLHEAD		
Comment:	Wellheads fenced with steel rod		
Corrective Action:		Date:	
Type	LOCATION		
Comment:	Location fence with 6' chain link		
Corrective Action:		Date:	

<b>Equipment:</b>			corrective date
Type: Horizontal Separator	# 1		
Comment:	Temporary knockout for combustor at separators. Plastic bucket begin used to drain fluids fire extinguisher covered in oil see photos 38,42 & 44. Other fire extinguishers observed on location without proper tags		
Corrective Action:	Implement actions to fully comply with Rule 606A regarding fire prevention and protection	Date:	01/08/2018
Type: Ancillary equipment	#		
Comment:	Generator		
Corrective Action:		Date:	
Type: Emission Control Device	# 4		
Comment:			
Corrective Action:		Date:	
Type: Gas Meter Run	# 2		
Comment:			
Corrective Action:		Date:	
Type: Bird Protectors	# 15		
Comment:			
Corrective Action:		Date:	
Type: Vertical Separator	# 1		
Comment:	Temporary separator at wellheads		
Corrective Action:		Date:	
Type: Plunger Lift	# 9		
Comment:	Leaks observed on Vail 1 and 10		

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:	02/04/2018
Type: VRT	# 2		
Comment:			
Corrective Action:		Date:	
Type: Horizontal Heated Separator	# 9		
Comment:	GPS 40.328648/-104.959290		
Corrective Action:		Date:	
Type: VRU	# 3		
Comment:			
Corrective Action:		Date:	
Type: Flare	# 2		
Comment:	QTI Combustors in operation		
Corrective Action:		Date:	

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	1	<100 BBLS	CONCRETE SUMP/VAULT		,
Comment:	In same berms as other tanks. unknown content as it is not labeled				
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:				
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	3	400 BBLS	STEEL AST		,
Comment:	same berms as water tanks				
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	6	400 BBLs	STEEL AST		40.329207,-104.959181
Comment:		Tanks have coating of oily substance. Appears tanks have been overpressured. Ensure pressure relief valves are working to manufacture's recommended standards			
Corrective Action:		Clean Tanks		Date: 02/04/2018	
<b>Paint</b>					
Condition	Adequate				
Other (Content)					
Other (Capacity)					
Other (Type)					
<b>Berms</b>					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate	
Comment:					
Corrective Action:				Date:	
<b>Venting:</b>					
Yes/No					
Comment:					
Corrective Action:					Date:
<b>Flaring:</b>					
Type	Ignitor/Combustor				
Comment:	Onsite personnel relayed 5 wells were going down pipeline and 4 were begin flared due to line restriction. No record of sundry to approve flaring in database found				
Corrective Action:	Since the flaring or venting occurred after flowback without approval, contact the COGCC Area Engineer for next steps per Rule 912.b. within 2 business days of inspection			Date: 01/08/2018	

**Location Construction**

Location ID: 443507 CDP: \_\_\_\_\_

Comment:

Corrective Action:

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

**Form 2A COAs:**

**Comment:**

Corrective Action:

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

**Wildlife BMPs:**

**Comment:**

Corrective Action:

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

**Comment:**

**Corrective Action:**

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

**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:

Inspected Facilities										
Facility ID:	443498	Type:	WELL	API Number:	123-42254	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:	PR									
Corrective Action:							Date:			
Facility ID:	443499	Type:	WELL	API Number:	123-42255	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			
Facility ID:	443500	Type:	WELL	API Number:	123-42256	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			
Facility ID:	443502	Type:	WELL	API Number:	123-42257	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			
Facility ID:	443503	Type:	WELL	API Number:	123-42258	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:	PR									
Corrective Action:							Date:			
Facility ID:	443504	Type:	WELL	API Number:	123-42259	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			
Facility ID:	443505	Type:	WELL	API Number:	123-42260	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			
Facility ID:	443506	Type:	WELL	API Number:	123-42261	Status:	PR	Insp. Status:	PR	
<b>Producing Well</b>										
Comment:										
Corrective Action:							Date:			

Facility ID:	443507	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	AO
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**Complaint**

Comment:	<p>Inspection performed in response to complaint #200445008 Complaint as follows:</p> <p>Detailed description of the issue or issues. ,Since late October 2017, Front Range Fire Rescue has responded to numerous 911 calls reporting a possible commercial structure fire southeast of Interstate 25 and Highway 60. We were able to determine that these calls were the result of large volumes of visible flames coming from the Cub Creek Energy Vail Pad. I've made contact with several administrative personnel as well as facility operators at this location and advised them that they were required to notify Weld County Dispatch any time they had visible flames because it was creating several nuisance calls for us. Additionally, because of the call nature that was generated by Dispatch, these calls also pulled in mutual aid fire engines from Berthoud and Loveland. During late October/early November, we responded to at least 6 such calls. They seemed to taper off for a while after all of my phone conversations. Unfortunately, they ramped up again around the Christmas/New Year holidays. During the past week, we have been sent to this same area for possible commercial structure fires at least two more times. With each of these dispatches, both Loveland and Berthoud have informed us that they will no longer respond to calls in this area due to the high volume of false calls. This creates an additional problem for us in that we will now not have our mutual aid companies responding if it turns out to be a legitimate fire-related call in this area. On 01/03/2018, I was driving in to work at approx. 0630 hrs. From I-25 and Hwy 60, I could see a large volume of visible flame from this same oil and gas facility. I contacted Weld County Dispatch to see if they had been notified of any flaring operations in this area. They stated that they had not, so I drove to the facility to make contact. I saw a white pickup truck (CO license plate EOG-033) parked near the separators with it's headlights on. I didn't see anyone inside, so I walked throughout all areas of the facility in an attempt to find the operator. After being unable to find the operator for at least 10-15 minutes, I realized that the operator must be inside his pickup. I approached the pickup and saw that he was asleep in the driver's seat. I knocked on the window and woke him up. I explained to him my previous communications with supervisors about notifying us for any visible flames. He told me that he had only been employed in the job for about 2 weeks and had never been told of that. I walked the facility with Mike Leonard (COGCC) today and noticed several other violations that concerned me. These included but were not limited to large amounts of product on the ground in the tank farm, pressure relief valves on top of the tanks that appeared to be damaged, and several open 5 gallon plastic buckets on the ground.</p> <p>CDPHE inspector also performed inspection on same day. No non-compliance of visible flames found. Onsite contractor said they would try to time well production as to not send too much to combustors and wuld cal Weld County dispatch if visible flames were noticed. No off-site odors were detected. All onsite spills are adressed in this inspection form.</p>		
Corrective Action:		Date:	

Facility ID:	443508	Type:	WELL	API Number:	123-42262	Status:	PR	Insp. Status:	PR
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**Producing Well**

Comment:	PR		
Corrective Action:		Date:	

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: DRY LAND

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

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? Fail

Comment Rat holes uncovered at wells 3,4,5,6 and 9. See attached photos

Corrective Action Close rat holes in compliance with Rule 1003 a. If holes are needed for future operations cover holes to prevent access and provide documentation as future timing and use of rat holes

Date 02/04/2018

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

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

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 \_\_\_\_\_

1003e. INTERIM VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: DRY LAND \_\_\_\_\_

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 \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

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

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

Date \_\_\_\_\_

Overall Final Reclamation \_\_\_\_\_ Well Release on Active Location  Multi-Well Location

**Attached Documents**

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

Document Num	Description	URL
678800475	Location Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4341463">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4341463</a>