

**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:

07/22/2019

Submitted Date:

07/23/2019

Document Number:

696101172

**FIELD INSPECTION FORM**

Loc ID 327361 Inspector Name: Evins, Bret 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: 10112  
Name of Operator: FOUNDATION ENERGY MANAGEMENT LLC  
Address: 5057 KELLER SPRINGS RD STE 650  
City: ADDISON State: TX Zip: 75001

**Findings:**

- 27 Number of Comments
- 4 Number of Corrective Actions
- Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
Koehler, Bob		bob.koehler@state.co.us	
Allison, Rick		rick.allison@state.co.us	
Beard, Alyssa		regulatory@foundationenergy.com	<a href="#">Regulatory Manager   All Inspections</a>
Pesicka, Conor		conor.pesicka@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
150256	UIC ENHANCED RECOVERY	AC			-	SOONER D SAND UNIT	AC
246765	WELL	SI	05/01/2019	OW	123-14562	SOONER UNIT 6-21	PR

**General Comment:**

This is a WELL & UIC - ENHANCED RECOVERY FACILITY / BATTERY Inspection.  
Facility / Battery: Active Operation.  
Wells: 1 well: Producing | PR.  
Annual UIC inspection.  
Centralized Battery serves 8 Location IDs: (327361, 327558, 330359, 323513, 323740, 323773, 330480, 330509).  
8 - Producing | PR, Shut-In | SI, or Temporarily Abandoned | TA wells.  
Centralized Battery serves 2 Location IDs: (323509, 326746).  
2 - Injection | IJ UIC wells. Active Injection.  
Centralized Battery formerly served 2 Location IDs: (319078, 323461).  
2 - Injection | IJ UIC wells. Plugged & Abandoned | PA.  
Follow-up to Field Inspection Report Doc #691200458 dated 09/18/2018.

Location			
<b>Lease Road:</b>			
	Type	Access	
	comment:	Adequate	
	Corrective Action:		Date:
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
	Type	BATTERY	
	Comment:		
	Corrective Action:		Date:
	Type	WELLHEAD	
	Comment:		
	Corrective Action:		Date:
	Type	TANK LABELS/PLACARDS	
	Comment:		
	Corrective Action:		Date:
<b>Emergency Contact Number:</b>			
	Comment:	<input style="width: 50%;" type="text"/>	
	Corrective Action:	<input style="width: 50%;" type="text"/>	Date: _____
<b>Good Housekeeping:</b>			
	Type	OTHER	
	Comment:	Stained soil around wellsite. Near pumping unit base and wellhead. Oily waste. See photos #1-4.	
	Corrective Action:	Remove and/or remediate stained soil around wellsite. Comply w/ Rule 907.e. See photos #1-4.	Date: <u>08/22/2019</u>
	Type	DEBRIS	
	Comment:	Prior insp: Debris in produced H2O tank room behind Middle West & Middle East H2O tanks. Refer to Rule 603.f for guidance. Remove debris. Comply with Rule 603.f. Corrective Action date: 09/28/2018.  This insp: * Debris in produced H2O tank room behind Middle West & Middle East H2O tanks NOW removed. See photos #7-10.	
	Corrective Action:		Date:
	Type	OTHER	

Comment:	Prior insp: Stained equipment / floor in injection pump house. Remove or remediate stained soil; 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. Corrective Action date: 08/15/2016. Original Corrective Action date remains applicable. See photos #31-34.		
Corrective Action:	Remove or remediate stained soil; 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. Corrective Action date: 08/15/2016. Original Corrective Action date remains applicable. See photos #31-34.	Date:	08/15/2016
Type	WEEDS		
Comment:	Weed encroachment on floor of produced H2O pit. Remove, manage, & control weeds on floor of produced H2O pit. Comply with Rule 603.f. See photo #38.		
Corrective Action:	Remove, manage, & control weeds on floor of produced H2O pit. Comply with Rule 603.f. See photo #38.	Date:	08/02/2019
Type	DEBRIS		
Comment:	Prior insp: Debris near East produced H2O tanks remains. Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable. Refer to Rule 603.f for guidance. Remove debris. Comply with Rule 603.f. Corrective Action date: 07/17/2017.  This insp: * Debris near East produced H2O tanks NOW removed. See photos #5, 6.		
Corrective Action:		Date:	
Type	UNUSED EQUIPMENT		
Comment:	Prior insp: Unused equipment in North treater house, outside of North treater house, and near East door of produced H2O tank room. Refer to Rule 603.f for guidance. Remove unused equipment. Comply with Rule 603.f . Corrective Action date: 10/18/2018.  This insp: * Unused equipment in North treater house, outside of North treater house, and near East door of produced H2O tank room NOW removed. See photos #12-16.		
Corrective Action:		Date:	

Overall Good:

<b>Spills:</b>				
Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	WELLHEAD		
Comment:	Barbed wire.		
Corrective Action:			Date:
Type	PUMP JACK		
Comment:	Iron mesh panel		
Corrective Action:			Date:
<b>Equipment:</b>			corrective date
Type: Ancillary equipment	# 1		
Comment:	1 - Crude oil recycle pump w/ gas engine near crude oil tanks.		
Corrective Action:			Date:
Type: Pump Jack	# 1		
Comment:			
Corrective Action:			Date:
Type: Bird Protectors	# 1		
Comment:			
Corrective Action:			Date:
Type: Vertical Separator	# 3		
Comment:			
Corrective Action:			Date:
Type: Other	# 1		
Comment:	Injection pump for UIC Enhanced Recovery (H2O).		
Corrective Action:			Date:
Type: Gas Meter Run	# 3		
Comment:			
Corrective Action:			Date:
Type: Ancillary equipment	# 0		
Comment:	2 - H2O transfer pumps removed since prior insp.		
Corrective Action:			Date:
Type: Vertical Heater Treater	# 1		
Comment:	1 - Treater removed since prior insp.  Prior insp: Stained soil at North heater treater. Stained soil in both treater houses. Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable. Remove or remediate stained soil; 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. Corrective Action date: 08/07/2017.  This insp: * Stained soil at North heater treater. Stained soil in both treater houses NOW appears mitigated. See photos #11, 12, 19, 20.		

Corrective Action:		Date:	
Type: Prime Mover	# 2		
Comment:	Pumpjack: Electric motor Injection pump: Electric motor		
Corrective Action:		Date:	
Type: Bradenhead	# 1		
Comment:	Prior insp: Bradenhead is NOT plumbed to surface. Plumb bradenhead to surface. Mechanical conditions. 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. Corrective Action date: 10/18/2018.  This insp: * Bradenhead NOW appears plumbed to surface. See photos #1, 2.		
Corrective Action:		Date:	
Type: Deadman # & Marked	# 4		
Comment:	4/4 Prior insp: 2 - Unmarked guy line anchors at Sooner Unit 6-21 wellsite. Refer to Rule 1003.a for guidance. Install guy line markers per Rule 1003.a Corrective Action date: 10/03/2018.  This insp: * 2 - Unmarked guy line anchors at Sooner Unit 6-21 wellsite now appear marked / visible No photos available.		
Corrective Action:		Date:	
Type: Pig Station	# 1		
Comment:			
Corrective Action:		Date:	

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
			CENTRALIZED BATTERY		
Comment:	Centralized Battery serves 8 Location IDs: (327361, 327558, 330359, 323513, 323740, 323773, 330480, 330509). 8 - Producing   PR, Shut-In   SI, or Temporarily Abandoned   TA wells. Centralized Battery serves 2 Location IDs: (323509, 326746). 2 - Injection   IJ UIC wells. Active Injection. Centralized Battery formerly served 2 Location IDs: (319078, 323461). 2 - Injection   IJ UIC wells. Plugged & Abandoned   PA.				
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	1	OTHER	PBV STEEL		40.651679,-103.869894	
Comment:				Partially buried steel tank near pit placarded as produced H2O has NO capacity posted. Refer to Rule 210.d for guidance.		
Corrective Action:				Date:	09/23/2019	
Post capacity on or near partially buried steel tank in pit area. Comply w/ Rule 210.d. See photo #37.						

Paint	
Condition	Adequate
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Adequate	Walls Sufficent	Base Sufficient	Adequate		
Comment:				Shares berms w/ produced H2O pit & culvert sump.		
Corrective Action:				Date:		
Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	1	OTHER	PBV STEEL		40.651887,-103.869858	
Comment:				Drain tank near injection pump house		
Corrective Action:				Date:		

Paint	
Condition	Adequate
Other (Content)	
Other (Capacity)	60 Bbls.
Other (Type)	

Berms						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Adequate	Walls Sufficent	Base Sufficient	Adequate		
Comment:						
Corrective Action:				Date:		
Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	1	300 BBLs	FIBERGLASS AST		40.651887,-103.869858	
Comment:						
Corrective Action:				Date:		

<u>Paint</u>	
Condition	Adequate
Other (Content)	
Other (Capacity)	
Other (Type)	

<u>Berms</u>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate
Comment:				
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	400 BBLs	STEEL AST		40.651887,-103.869858

Comment:	<p>Prior insp:                  Stained soil at S produced H2O tank. Rust at valve.                  Operator arrived at location advised that tank NOT-in-USE.                  Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.                  Remove or remediate stained soil; 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.                  Repair and paint tanks per Rule 804.                  Corrective Action date: 08/07/2017.</p> <p>This insp:                  * 1 Tank has been removed. Stained soil NOW appears mitigated.                  See photos #25, 26.</p>			
Corrective Action:				Date:

<u>Paint</u>	
Condition	Adequate
Other (Content)	
Other (Capacity)	
Other (Type)	

<u>Berms</u>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate
Comment:				
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	4	300 BBLs	STEEL AST		40.652205,-103.869703

<b>Comment:</b>	<p>Equalizer lines connect the 4 crude oil tanks.</p> <p>Prior insp:                  Stained soil at crude oil tanks loadouts, drain lines, &amp; at crude oil recycle pump.                  Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.                  Remove or remediate stained soil; 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.                  Corrective Action date: 08/15/2016.</p> <p>This insp:                  * Stained soil at crude oil tanks loadouts, drain lines, &amp; at crude oil recycle pump NOW appears mitigated.                  See photos #21, 22, 27-30.</p>	
<b>Corrective Action:</b>		<b>Date:</b>

Paint

<b>Condition</b>	Adequate	
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate
<b>Comment:</b>				
<b>Corrective Action:</b>				<b>Date:</b>

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	5	300 BBLs	STEEL AST		40.651887,-103.869858

<b>Comment:</b>	<p>Prior insp:                  North bank of produced H2O tanks. Near Injection pump house.                  Stained soil around tanks, including in pump house.                  Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.                  Remove or remediate stained soil; 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.                  Corrective Action date: 08/15/2016.</p> <p>This insp:                  * Stained soil around North bank of produced H2O tanks. Near Injection pump house.                  NOW appears mitigated.                  See photos #23, 24.</p>	
<b>Corrective Action:</b>		<b>Date:</b>

Paint

<b>Condition</b>	Adequate	
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate
<b>Comment:</b>				

Corrective Action:		Date:	
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**Venting:**

Yes/No	NO		
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 150256 Type: UIC API Number: - Status: AC Insp. Status: AC

Facility ID: 246765 Type: WELL API Number: 123-14562 Status: SI Insp. Status: PR

**Producing Well**

Comment: [Producing | PR.](#)  
[Power off to pump jack. Production valves at wellhead are open to flowline.](#)  
[\(Tubing & Casing\).](#)

Corrective Action:

Date:

**Reclamation - Storm Water - Pit**

**Storm Water:**

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

Comment:

Corrective Action:

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

**Pits:**  NO SURFACE INDICATION OF PIT

Type: Produced Water Lined: NO Pit ID: 112069 Lat: 40.651460 Long: -103.869821

Reference Point: SE Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment:

Corrective Action

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

**Fencing:**

Fencing Type: None Fencing Condition: \_\_\_\_\_

Comment:

Corrective Action

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

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment:

Corrective Action

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

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: NO 2+ feet Freeboard: YES

Comment:

Corrective Action

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

**COGCC Comments**

Comment	User	Date
<p><a href="#">COGCC Inspection Report Summary:</a></p> <p>On MON 07/22/2019 at approximately 13:47 hrs. I, Bret Evins, conducted an on-site inspection at:                      Operator Name: FOUNDATION ENERGY MANAGEMENT LLC                      Location Name: SOONER UNIT-68N58W /21SENW                      Location ID: 327361                      Well Name: Sooner Unit 6-21                      API: 05-123-14562                      Facility Name: SOONER D SAND UNIT /                      Facility ID: 150256                      Facility Type: UIC ENHANCED RECOVERY                      Location County: Weld County, Colorado                      Weather: Dry</p> <p>While there, I observed:                      Wells: 1 well: Producing   PR.</p>	evinsb	07/23/2019

UIC Injection Facility / Battery: Active Operation.  
Facility Type: UIC Enhanced Recovery  
Annual UIC inspection.

Centralized Battery serves 8 Location IDs: (327361, 327558, 330359, 323513, 323740, 323773, 330480, 330509).

8 - Producing | PR, Shut-In | SI, or Temporarily Abandoned | TA wells.

Centralized Battery serves 2 Location IDs: (323509, 326746).

2 - Injection | IJ UIC wells. Active Injection.

Centralized Battery formerly served 2 Location IDs: (319078, 323461).

2 - Injection | IJ UIC wells. Plugged & Abandoned | PA.

Follow-up to Field Inspection Report Doc #691200458 dated 09/18/2018.

9 of 9 Corrective Actions appears addressed.

1.) Unused equipment in North treater house, outside of North treater house, and near East door of produced H2O tank room.

Refer to Rule 603.f for guidance.

Remove unused equipment. Comply with Rule 603.f .

Corrective Action date: 10/18/2018.

\* Unused equipment in North treater house, outside of North treater house, and near East door of produced H2O tank room NOW removed.

See photos #12-16.

2.) Debris near East produced H2O tanks remains.

Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.

Refer to Rule 603.f for guidance.

Remove debris. Comply with Rule 603.f.

Corrective Action date: 07/17/2017.

\* Debris near East produced H2O tanks NOW removed.

See photos #5, 6.

3.) Debris in produced H2O tank room behind Middle West & Middle East H2O tanks.

Refer to Rule 603.f for guidance.

Remove debris. Comply with Rule 603.f.

Corrective Action date: 09/28/2018.

\* Debris in produced H2O tank room behind Middle West & Middle East H2O tanks NOW removed.

See photos #7-10.

4.) Stained soil at North heater treater. Stained soil in both treater houses.

Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.

Remove or remediate stained soil; 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.

Corrective Action date: 08/07/2017.

\* Stained soil at North heater treater. Stained soil in both treater houses NOW appears mitigated.

See photos #11, 12, 19, 20.

5.) 2 - Unmarked guy line anchors at Sooner Unit 6-21 wellsite.

Refer to Rule 1003.a for guidance.

Install guy line markers per Rule 1003.a

Corrective Action date: 10/03/2018.

\* 2 - Unmarked guy line anchors at Sooner Unit 6-21 wellsite now appear marked / visible  
No photos available.

6.) Stained soil at S produced H2O tank. Rust at valve.

Operator arrived at location advised that tank NOT-in-USE.

Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.

Remove or remediate stained soil; 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.

Repair and paint tanks per Rule 804.

Corrective Action date: 08/07/2017.

\* Tank has been removed. Stained soil NOW appears mitigated.

See photos #25, 26.

7.) Stained soil at crude oil tanks loadouts, drain lines, & at crude oil recycle pump.

Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.

Remove or remediate stained soil; 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.  
Corrective Action date: 08/15/2016.  
\* Stained soil at crude oil tanks loadouts, drain lines, & at crude oil recycle pump NOW appears mitigated.  
See photos #21, 22, 27-30.  
8.) North bank of produced H2O tanks. Near Injection pump house.  
Stained soil around tanks, including in pump house.  
Original CA date from previous FIR #684903891 dated 7/7/2017 remains applicable.  
Remove or remediate stained soil; 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.  
Corrective Action date: 08/15/2016.  
\* Stained soil around North bank of produced H2O tanks. Near Injection pump house. NOW appears mitigated.  
See photos #23, 24.  
9.) Bradenhead is NOT plumbed to surface.  
Plumb bradenhead to surface.  
Mechanical conditions.  
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.  
Corrective Action date: 10/18/2018.  
\* Bradenhead NOW appears plumbed to surface.  
See photos #1, 2.

1 of 1 Prior Corrective Actions appears NOT addressed.  
1.) Stained equipment / floor in injection pump house.  
Remove or remediate stained soil; 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.  
Corrective Action date: 08/15/2016.  
Original Corrective Action date remains applicable.  
See photos #31-34.

3 - NEW Corrective Actions observed.  
1.) Partially buried steel tank near pit placarded as produced H2O has NO capacity posted. Refer to Rule 210.d for guidance. Post capacity on or near partially buried steel tank in pit area.  
Comply w/ Rule 210.d.  
Corrective Action date: 09/23/2019.  
See photo #37.  
2.) Weed encroachment on floor of produced H2O pit.  
Remove, manage, & control weeds on floor of produced H2O pit. Comply with Rule 603.f.  
Corrective Action date: 08/02/2019.  
See photo #38.  
3.) Stained soil around wellsite. Near pumping unit base and wellhead.  
Oily waste. Remove and/or remediate stained soil around wellsite.  
Comply w/ Rule 907.e.  
Corrective Action date: 08/22/2019.  
See photos #1-4.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

This is a summary of the inspection report.

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**Attached Documents**

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

Document Num	Description	URL
696101173	Site photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4887958">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4887958</a>