

**FORM
INSP**

Rev
X/20

**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:

06/22/2021

Submitted Date:

06/24/2021

Document Number:

700600271

FIELD INSPECTION FORM

Loc ID 414280 Inspector Name: Kosola, Jason 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: 10722
Name of Operator: KTM OPERATING LLC
Address: 1246 BAYOU LACARPE ROAD
City: HOUMA State: LA Zip: 70360

Findings:

- 7 Number of Comments
- 2 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
Vincent, Kenny	(337) 654-9404	kvincent@reagan.com	Principal Agent
Vincent, Kenny	(337) 654-9404	kvincent@reagan.com	Principal Agent
Hecht, Jaime		jaime.hecht@dynacloud.io	
Morgan, John		john.morgan@state.co.us	
Sherman, Susan		susan.sherman@state.co.us	
Lindley, Trent		trent.lindley@state.co.us	COGCC Enforcement
Del Hierro, Chris	720-431-7468	chris@CDHConsult.com	
McCann, Randall	337-654-9804	rmccann@pcminc.com	Designated Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159331	UIC DISPOSAL	AC	03/11/2010		-	CRAIG 6-4 SWD	EI
414278	WELL	IJ	07/10/2015	DSPW	073-06391	CRAIG 6-4 SWD	EI
479428	SPILL OR RELEASE	AC	03/04/2021		-	Craig 6-4 SWD	EI

General Comment:

This is an environmental inspection only. Any corrective actions from previous inspections that have not been addressed are still applicable. Photos attached to document site condition at the time of inspection.

Operator has not made attempts to address violations from Notice of Alleged Violation #402658245 which was issued on 4/14/2021 with Corrective Action due dates of 5/14/2021. This location is in years long violation of COGCC rules and will result in substantial financial penalties to KTM Operating unless immediate action is taken to address violations.

Spill 479428 remains open. Operator has not submitted Form 19 as required to request closure of spill as clean up is now under active Remediation 17974. Operator shall submit Form 19 Subsequent as required per rule and fill out corrective actions tab as required per COA on Form 19 402614154. Remediation work was scheduled to be conducted by 6/15/2021 per approved document 402682134 but operator has provided no updates to COGCC regarding remediation work.

Aerial photography shows an apparent historic release to the southeast of tank battery. Operator shall update active remediation 17974 with plan to delineate and remediate this release.

Inspected Facilities

Facility ID: 159331 Type: UIC API Number: - Status: AC Insp. Status: EI

Facility ID: 414278 Type: WELL API Number: 073-06391 Status: IJ Insp. Status: EI

Facility ID: 479428 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: PRODUCED WATER Estimated Spill Volume: _____

Comment: An historic release of produced water resulting in vegetation kill is evident on the southeast corner of tank battery. See attached photos.

Corrective Action: Update active remediation 17974 with plan to delineate and remediate impacted soil off the southeast corner of the tank battery. Date: 07/02/2021

Reportable: YES GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

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: [Impacted soils stored on location.](#)

Corrective Action: [Install or repair required BMPs per Rule 1002.f.\(2\)C or dispose of impacted soils per Rule 905.b.\(3\)](#)

Date: 06/26/2021

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
402728949	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5463509
700600272	Inspection photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5463507