

**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:

05/23/2022

Submitted Date:

05/27/2022

Document Number:

700300410

FIELD INSPECTION FORMLoc ID 325918 Inspector Name: LABOWSKIE, STEVE On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 41440

Name of Operator: HUBBS III, LLC

Address: 367 COUNTY ROAD 129

City: HESPERUS State: CO Zip: 81326

Status Summary:

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

Findings:

11 Number of Comments

5 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
Burger, Craig		craig.burger@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Hubbs, Barbara		barbarahubbs@gmail.com	Principal Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
215566	WELL	PR	01/01/2012	OW	067-07171	TED & HAZEL 11-1	PR

General Comment:

SW Compliance supervisor along with inspector Alex Klink performed general and optical gas imaging inspection to follow up on approved Form 4 to vent/flare doc# 401032499 which stated well could not reduce without venting ~1.3 mcf/day. No gas capture plan or variance request in digital well file.

It appears spill documented in previous 8/26/2021 EI doc#688800984 has been stopped and material cleaned up around wellhead but that material or similar material is now improperly stored on site in an open top single layer metal stock tank.

This inspection does not address request for Form 27 in order to close Pit Facility ID #100561

LocationOverall Good: ☒

Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	tank has contents, capacity and NFPA		
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	
Type	OTHER		
Comment:	55 gal drum hand labeled "condensate" no NFPA		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	condensate barrel stored within 50 feet of well		
Corrective Action:	Do not store flamaable liquids within 50 feet of wellbore per Rule 610.d	Date:	06/03/2022
Type	OTHER		
Comment:	Storage of impacted material in open top stock tank		
Corrective Action:	remove and properly dispose of waste per Rules 606.a, d and 905.a, provide disposal receipts/manifests to area EPS	Date:	06/03/2022
Type	STORAGE OF SUPL		
Comment:	tools and supplies stored next to pump jack		
Corrective Action:		Date:	

Overall Good: ☐

Spills:			
Type	Area	Volume	

In Containment: No

Comment: Spill documented in EI doc#68880984 appear to have been removed from wellhead area. Imparted material stored on site.

☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLS	STEEL AST		,
Comment: see Optical Gas Imaging section for CA related to tank vent					

Corrective Action:		Date:	
Paint			
Condition	Adequate		
Other (Content)			
Other (Capacity)			
Other (Type)			
Berms			
Type	Capacity	Permeability (Wall)	Permeability (Base)
Earth	Inadequate	Walls Sufficient	Base Sufficient
Comment:		Weeds cited in previous EI FIR have been removed or died off, some short dead weeds present. Berms appear weathered, especially on south side of battery.	
Corrective Action:		Date: 06/27/2022	
		Maintain/raise berms and confirm adequate capacity per 605.a(4) - note tank rules and containment capacity requirements pre 1/15/2021 apply for this situation with tank pre 1/15/2021 that has not had major modifications.	
Venting:			
Yes/No	YES		
Comment:	Operator request to vent/flare doc# 401032499 was approved in 2016 and stated the well could only run for 3 days without venting. FLIR data shows free flowing gas through regulator and end of scrubber pot to regulate back pressure for natural gas engine not as an emergency PRV, this is considered venting by COGCC. Venting and flaring rules (903.b) changed on 1/15/2022. Form 7 reports gas produced = gas used, no reporting of gas flared as required for all gas vented or flared.		
Corrective Action:	Comply with Rules 903.d(3) and 608.e		Date: 06/03/2022
Flaring:			
Type			
Comment:			
Corrective Action:			Date:

Inspected Facilities				
Facility ID: 215566	Type: WELL	API Number: 067-07171	Status: PR	Insp. Status: PR
Producing Well				
Comment:				
Corrective Action:				Date:

Optical Gas Imaging Survey

Survey Type: _____

Current Operations: ☒ Production ☐ Workover ☐ Flowback ☐ Referred to APCD

GPS(entrance of location): Lat: _____ Long: _____

Wind: Gusts _____ Speed: 3-10 (mph) Direction From: N/NW Weather: Partly Temperature: (F) _____

Assisting Staff: _____ Camera #: _____

☐ Visible Smoke ☐ Referred to CDPHE

Times Surveyed

Equipment Surveyed

Time Survey Start	AM/PM	Time Survey End	AM/PM	Equipment
				Flowline
				Oil Tank(s)
				Wellhead(s)

Comment: Vent line on crude oil tank appears to vent continuously without a vapor control system or pressure relief valve

Corrective Action: Comply with Rule 605.a(10)

Date: 06/27/2022

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

Document Num	Description	URL
700300416	FLIR video - tank vent	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5765396
700300417	venting through open ended regulator on fuel line	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5765397
700300418	storage of impacted material	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5765398
700300419	storage, flammable liquid storage 50' of well	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5765399