

**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:

09/07/2023

Submitted Date:

09/15/2023

Document Number:

712700625

FIELD INSPECTION FORMLoc ID 325918 Inspector Name: Pattillo, Curtis 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:

20 Number of Comments

3 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
Labowskie, Steve		steve.labowskie@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 Specialist Curtis Pattillo and Tom Beardslee conducted a field inspection of the access road and well location, and recorded video with the FLIR camera.

See FLIR Section. Immediate action required to cease venting casing gas. See Tank Section, pressure relief valve appears to be malfunctioning or improperly sized.

Location			
Lease Road:			
Type	Access		
comment:	Dirt two-track		
Corrective Action	L	Date:	
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	NFPA placard and tank contents labeling.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Metal sign posted at tank battery.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	55 gallon drum hand labeled "condensate", no NFPA.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:	Posted on wellhead sign.		
Corrective Action:			Date: _____
Good Housekeeping:			
Type	STORAGE OF SUPL		
Comment:	Corrective action identified in FIR Doc.#700300410 has been completed. 55 gallon "condensate" drum stored on edge of location.		
Corrective Action:			Date:
Type	OTHER		
Comment:	Corrective action identified in FIR Doc.#700300410 has been completed. Did not observe impacted material stored on location.		
Corrective Action:			Date:
Type	STORAGE OF SUPL		
Comment:	Observed a tupperware tote with two containers within, one labeled engine oil. See Photo #4. Remove if not needed for ongoing operations.		
Corrective Action:			Date:
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment: _____			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	PUMP JACK		

Comment:	Cattle panel around pumpjack not properly erected and secured.			Date:	09/22/2023
Corrective Action:	Correctly assemble cattle panel fencing or remove as unused equipment per Rule 606.			Date:	09/22/2023
Equipment:				corrective date	
Type: Deadman # & Marked	# 4				
Comment:				Date:	
Corrective Action:				Date:	
Type: Flow Line	# 2				
Comment:	2" line from wellhead to tank. 1" line from wellhead to prime mover.			Date:	
Corrective Action:				Date:	
Type: Pump Jack	# 1				
Comment:				Date:	
Corrective Action:				Date:	
Type: Ancillary equipment	# 1				
Comment:	Wellhead			Date:	
Corrective Action:				Date:	
Type: Prime Mover	# 1				
Comment:	Natural gas motor			Date:	
Corrective Action:				Date:	
Type: Bradenhead	# 1				
Comment:				Date:	
Corrective Action:				Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		37.120710,-108.116840
Comment:	FLIR camera survey of tank shows similar conditions as noted in FIR Doc#700300410. Gas observed continous release indicates malfunctioning or improperly sized pressure relief valve. See attached FLIR video #2.				
Corrective Action:	Comply with Rule 608.a.(9) & (10).				Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficent	Base Sufficent	Adequate
Comment:	Corrective action identified in FIR Doc.#700300410 has been completed. Observed adequate and maintained tank berms.			
Corrective Action:				Date:

Venting:

Yes/No	YES		
Comment:	Casing gas venting through gas regulator. No gas capture plan, no Form 4, no variance request in well file. Operator has been reporting gas flared since January 2022. Corrective action date is retained from FIR Doc.#700300410.		
Corrective Action:	Cease venting casing gas to atmosphere per Rule 903.d(3).	Date:	

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:					
BradenHead									
Date of Last Brhd Test:	10/23/2022	Annual Brhd Completed?	No						
Last Brhd Test Results	Initial Surf Csg Pressure:	3	Fluid Type:						
	End Surf Csg Pressure:	0							
Comment:									
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
Compaction	Pass	Ditches	Pass	Material Handling And Spill Prevention	Pass	Container within containment.

Comment:

Tear drop around production equipment.
No visible erosion or sediment migration observed during inspection.

Corrective Action:

Date:

Pits: ☒ NO SURFACE INDICATION OF PIT

Optical Gas Imaging SurveySurvey Type: RoutineCurrent Operations: ☒ Production ☐ Workover ☐ Flowback ☐ Referred to APCDGPS(entrance of location): Lat: 37.120710 Long: -108.116840Wind: Calm Speed: 5 (mph) Direction From: W Weather: Clear Temperature: 79 (F)Assisting Staff: Tom Beardslee Camera #: _____☐ Visible Smoke ☐ Referred to CDPHE

Times Surveyed

Equipment Surveyed

Time Survey Start	AM/PM	Time Survey End	AM/PM	Equipment
12:15	PM	12:16	PM	Oil Tank(s)
12:06	PM	12:07	PM	Flowline

Comment: [Observed gas with FLIR camera on fuel gas separator next to pumpjack gearbox. See attached FLIR camera video #1.](#)
[Observed gas with FLIR camera out of pressure relief valve atop crude oil tank, steady flow. See attached FLIR camera video #2.](#)
[Corrective actions identified in FIR Doc.#700300410 have not been completed. Corrective action date has been retained.](#)
[See Venting section, See Tank section for corrective actions.](#)

Corrective
Action:

Date:

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

Document Num	Description	URL
403531748	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6252655
712700629	FLIR Video #1	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6252641
712700630	FLIR Video #2	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6252643
712700631	Well Location Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6252644