

**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:

11/16/2023

Submitted Date:

11/19/2023

Document Number:

710100082

**FIELD INSPECTION FORM**

Loc ID: 484897    Inspector Name: Anderson, Laurel    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: 10583  
Name of Operator: PETRO OPERATING COMPANY LLC  
Address: 9033 E EASTER PLACE SUITE 112  
City: CENTENNIAL    State: CO    Zip: 80112-

**Findings:**

- 4 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
Serra, Toni		toni@garnow.com	Principal Agent
Parker, Erin		erinbparker9@gmail.com	
Graber, Nikki		nikki.graber@state.co.us	
Farkas, Joel		joelfarkas@gmail.com	
Silver, Randy		randy.silver@state.co.us	

**General Comment:**

On November 16, 2023, ECMC Environmental Protection Specialist (Laurel Anderson) conducted a field inspection in response to a reported spill of oil based drilling mud at the intersection of CR18 and the access road to Petro Operating Company LLC's LG Everist/2N66W30 location (Location ID 484897). For more information regarding the details of the spill see the related Form 19i (Doc #403594775).

During the Environmental Inspection, ECMC noted ~2" of what appeared to be recently lain loose dirt fill on top of pre-existing fill along the access road. Dirt fill beneath the fresh fill along the access road (SS-01 and SS-02) and in the drainage area (SS-03) was visibly stained. ECMC collected three discrete soil samples. PIDs ranged from 20.5 to 39.4 ppm. The 39.4 ppm sample (SS01@4") was collected near the center of the dirt access road adjacent to CR18 in visibly stained soil (see map for soil sample locations). The soil sample was packed in laboratory provided jars using standard environmental practices and immediately placed on ice and submitted under standard chain of custody for laboratory analysis of complete Table 915-1 contaminants of concern in soil. Results are pending.

Material spilled along CR18 had been cleaned prior to ECMC's Inspection.

Field notes, photo documentation and a map are attached to document conditions at the time of inspection. Any corrective action(s) and corrective action due dates from previous inspections that have not been addressed are still applicable.

Note: This inspection was combined with an ECMC Environmental Inspection of Petro Operating Company LLC's Counter 1-AD Tank Battery (Facility ID: 470203) and COUNTER-62N66W 30NWNW (Location ID: 318924). A separate Field Inspection Report has been submitted for corrective actions at the tank battery (FIR Doc #710100078).

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Operator has indicated: "The spill was contained to the paved county road surface." Stained soil along the dirt access road and within the drainage adjacent to CR18 indicate the spill likely extended beyond the paved county road.

Corrective Action: In accordance with 913.d.(1) Operator will investigate impacts to soil, Groundwater, and surface water as soon as the impacts are discovered. Per Rule 912.b.(3) Operator will submit a Supplemental Form 19 within 10 days of spill discovery. Operator shall provide at minimum 48 hour notice to ECMC EPS Laurel Adnerson (laurel.anderson@state.co.us) prior to any sampling or excavation/backfill activities performed on location. Date: 11/14/2023

Reportable: \_\_\_\_\_ 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: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)
Comment	Impacted soil is suspected adjacent to CR18 and within the drainage area which parallels CR18.		
Corrective Action	Operator shall comply with ECMC Rule 913.b.(5)B.iv and all applicable 1002 Rules.		Date: <u>11/14/2023</u>

**Spill/Remediation:**

Comment:

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

Emission Control Burner (ECB): \_\_\_\_\_

Comment:

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Attached Documents**

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

Document Num	Description	URL
403600780	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328341">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328341</a>
710100083	ECMC Photo Documentation	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328335">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328335</a>
710100084	ECMC Field Notes	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328336">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328336</a>
710100086	ECMC Soil Sample Location Figure	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328337">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328337</a>