

**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:

01/16/2024

Submitted Date:

01/19/2024

Document Number:

710500152**FIELD INSPECTION FORM**Loc ID 307489 Inspector Name: Sanchez, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10705Name of Operator: EVERGREEN NATURAL RESOURCES LLCAddress: 1875 LAWRENCE ST STE 1150City: DENVER State: CO Zip: 80202**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**14 Number of Comments5 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
Waggoner, Kyle		kyle.waggoner@state.co.us	
Beardslee, Tom		tom.beardslee@state.co.us	
, ENR	719-846-7898	cogcc.evergreen@enrllc.com	All Inspections
Koepsell, Arthur		arthur.koepsell@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
113681	PIT	AC	09/23/1999		-	Cindy H 23-27 PIT	AC

General Comment:

This is an Environmental Inspection for the Cindy H 23-27 Active Well Location Located in Las Animas County Colorado. This inspection was conducted in response to ECMC Landowner Complaint # 403589914 received for concerns regarding elevated levels of Rad 226 and Rad 228 concentrations found in 909j water sampling. At the time of inspection, the well was not pumping but did show signs of production in the form of frozen water in the water flowline connected to the wellhead and frozen water pooled in the bottom of the Active Pit, Permit # 113681.

Location

Lease Road:			
Type	Access		
comment:	The Access road was frozen and partially covered with snow at the time of onsite visit.		
Corrective Action		Date:	

Overall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	The Well Placard is located on the Meter House located onsite.		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:			
Corrective Action:			
	Date: _____		

Good Housekeeping:			
Type	TRASH		
Comment:	At the time of inspection, there was an unused exhaust hose and oil diaper located on the north end of the Pumping Unit base.		
Corrective Action:	Cleanup unused equipment and trash, Maintain location per Rule 606.		Date: 01/31/2024

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Pump Jack	# 1		
Comment:	There are signs of oil stains located on the Pumping Unit base/block. The oil has migrated off the blocks onto native ground causing oil staining on the soils adjacent to the Pumping Unit.		
Corrective Action:	Clean up oil stains on soil and equipment. Maintain equipment per Rule 608.e.		Date: 01/31/2024

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
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

Comment:

Corrective Action:

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PITType: Produced WaterLined: NOPit ID: 113681Lat: 37.140503Long: -104.769016

Reference Point: _____

Other: _____

Length: _____

Width: _____

Lining:

Liner Type:

Liner Condition:

Comment: Pit Coordinates need to be updated for Pit Facility # 113681

Corrective

Update Pit coordinates per Rule 909.a.Date: 02/07/2024**Fencing:**Fencing Type: LivestockFencing Condition: AdequateComment: At the time of inspection, the fencing surrounding the pit was maintained. Fencing is comprised of 3 strands of barbed wire.

Corrective

Date: _____

Netting:

Netting Type:

Netting Condition:

Comment: No netting

Corrective

Date: _____

Anchor Trench Present:

Oil Accumulation:

2+ feet Freeboard:

Comment:

Corrective

Date: _____

Type: Produced WaterLined: NOPit ID: 113681Lat: 37.140503Long: -104.769016

Reference Point: _____

Other: _____

Length: _____

Width: _____

Lining:

Liner Type:

Liner Condition:

Comment: After a review of pit Data, it is noted 909.j. Produced Water Quality Analyses data for 2022 and 2023 was not submitted for the water production associated with the Cindy H 23-27 Pit/Well Location.

Corrective Action

Operator shall provide 909.j. data for 2022 and 2023 Per Rule 909.j.(2)B.i Operators will collect and analyze samples on an annual basis after the initial sampling and analysisDate: 02/02/2024**Fencing:**

Fencing Type:

Fencing Condition:

Comment:

Corrective

Date: _____

Netting:

Netting Type:

Netting Condition:

Comment:				Date:
Corrective				
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:		
Comment:				Date:
Corrective				
Type: <u>Produced Water</u>	Lined: <u>NO</u>	Pit ID: <u>113681</u>	Lat: <u>37.140503</u>	Long: <u>-104.769016</u>
Reference Point:	Other:	Length:	Width:	
<u>Lining:</u>				
Liner Type:	Liner Condition:			
Comment:	Operator shall supply 909.j Produced Water Quality Analyses data for the 2024 calendar year for the water production associated with the Cindy H 23-27 pit/well. 909.j. Produced Water Quality Analyses is due within 60 days from receipt of this field inspection.			
Corrective Action	Per Rule 909.j.(2)B.i Operators will collect and analyze samples on an annual basis after the initial sampling and analysis			Date: <u>03/19/2024</u>
<u>Fencing:</u>				
Fencing Type:	Fencing Condition:			
Comment:				
Corrective Action				
<u>Netting:</u>				
Netting Type:	Netting Condition:			
Comment:				
Corrective Action				
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:		
Comment:				Date:
Corrective Action				
Monitoring:	Monitoring Type	Comment		
	Chain	Chain present		

COGCC Comments

Comment	User	Date
ECMC reviewed Analytical Data provided to the ECMC in the form of 909.j. Produced Water Quality Analyses collected from the wellhead on 12/16/2021. The Data provided shows elevated levels of Rad 226 and Rad 228, the combined total for [Ra226_Ra228] are elevated above the standards outlined in REGULATION NO. 41 – Known as, THE BASIC STANDARDS FOR GROUND WATER. Bullet [41.5.C.(2)] Groundwater Quality Standards, Statewide Standards, Radioactive Materials Standards	sanchezcc	01/16/2024
This pit inspection occurred in response to Landowner Complaint # 403589914. Landowner Complaint 403589914 states the following; "Records indicate a well in Sarcillo Canyon, on CR41.7, in Las Animas County, has a level of radium 226 and 228 that is 10 times the accepted level for human and environmental concerns. The name of the well is Cindy H. The pit is unlined and the well is actively pumping water into the pit. The issues are that with no lining in the pit, the water could reach the shallower water zones used for domestic uses. If the water is contaminated the soil would also be contaminated. How does that effect wildlife that might drink from the pit? My understanding is that there are several other pits with this same issue, within the Raton Basin, and the COGCC has not done any follow up to protect health or the environment. After leaving a call back number, no call back. Supporting documents are in COGCC records."	sanchezcc	01/16/2024

Attached Documents

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

Document Num	Description	URL
710500153	Location Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6400005