

**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:

03/19/2024

Submitted Date:

03/20/2024

Document Number:

702502496

**FIELD INSPECTION FORM**Loc ID 316271 Inspector Name: Burchett, Kirby On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10775

Name of Operator: KT RESOURCES LLC

Address: 3381 WESTBROOK LANE

City: HIGHLANDS State: CO Zip: 80129

**Status Summary:**

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

**Findings:**

12 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 |
|----------------|----------------|------------------|---------|
| Adams, Karen   | (303) 886-8733 | adams@kt-res.com |         |
| Baumgras, Dan  | (307) 321-3299 | Dan@KT-Res.com   |         |
| Wilson, Justin | (970) 878-3825 | jrwilson@blm.gov |         |
| Gale, Tony     | (303) 886-8733 | tony@kt-res.com  |         |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 260089      | WELL | PR     | 01/01/2024  | GW         | 103-10132 | WRD DOW 20-11 | PR          |

**General Comment:****ECMC Inspection Report Summary**

On Tuesday, 03/19/2024, Inspector Kirby Burchett, conducted a follow up field inspection at KT Resources LLC on the WRD Dow 20-11 well, Location #316271, in Rio Blanco County, Colorado.

This location is within or in close proximity to a Parks and Wildlife (CPW) District, Black Bear and High Priority area with NSO, Density and Other Consultation Habitat regulations.

Any Corrective Actions from previous Inspections are still applicable.

Follow up inspection in response to compliance issues observed during Insp. #707500289 on 4/19/23, Insp. #702501453 on 6/14/23 and follow up Insp. #702502289 on 1/17/24. Corrective Actions have not been resolved and original due dates will remain:

1. Leaking equipment and stained soils. (Unresolved)
2. Insufficient tank battery containment. (Unresolved)
3. Gas meter calibration out of compliance. (Unresolved)
4. Open end load line. (Unresolved)

Refer to Inspection Photos for observed compliance issue.

While there during normal operations no additional compliance issues were observed.

A follow up on this site inspection will be conducted to ensure all compliance issues have been corrected to comply with ECMC rules.

**Location**Overall Good: ☐**Signs/Marker:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               | WELLHEAD   |       |  |
| Comment:           | As Wellhead signs are replaced: The Well name; The API Number; and Its legal location, including the quarter/quarter section will be required.   |       |  |
| Corrective Action: |  | Date: |  |
| Type               | CONTAINERS   |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |
| Type               | OTHER  |       |  |
| Comment:           | As Location Entrance signs are replaced: The Well name; The Commission's Location identification number (ID #); The Operator's telephone number where it may be reached at all times; and the Telephone number(s) for local emergency services (911 where available) will be required. |       |  |
| Corrective Action: |  | Date: |  |
| Type               | TANK LABELS/PLACARDS   |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |
| Type               | BATTERY  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

Emergency Contact Number:

Comment: (800) 288-0560 or 911

Corrective Action:

Date: \_\_\_\_\_

Overall Good: ☐**Spills:**

| Type               | Area  | Volume   |  |       |            |
|--------------------|---|----------|--|-------|------------|
| Crude Oil          | Truck Loadout   | <= 1 bbl |  |       |            |
| Comment:           | Stained soil under loadout pot.   |          |  |       |            |
| Corrective Action: | Remove and properly dispose of oily waste and impacted soils.                   |          |  | Date: | 06/30/2023 |
| Crude Oil          | Tank  | <= 1 bbl |  |       |            |
| Comment:           | Access cover leaking on crude oil tank.   |          |  |       |            |
| Corrective Action: | Repair equipment. Remove and properly dispose of oily waste and impacted soils. |          |  | Date: | 06/30/2023 |

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

|                    |     |       |                 |
|--------------------|-----|-------|-----------------|
| Type: Plunger Lift | # 1 |       | corrective date |
| Comment:           |     |       |                 |
| Corrective Action: |     | Date: |                 |

|                                 |  |                  |
|---------------------------------|--|------------------|
| Type: Bradenhead                | # 1  |                  |
| Comment:                        |  |                  |
| Corrective Action:              |  | Date:            |
| Type: Gas Meter Run             | # 1  |                  |
| Comment:                        | Gas meter calibration out of compliance.   |                  |
| Corrective Action:              | Meters will be calibrated annually unless more frequent calibration is required by contractual obligations or by the Director. | Date: 01/28/2024 |
| Type: Horizontal Heater Treater | # 1  |                  |
| Comment:                        |  |                  |
| Corrective Action:              |  | Date:            |
| Type: Bird Protectors           | # 2  |                  |
| Comment:                        |  |                  |
| Corrective Action:              |  | Date:            |
| Type: Deadman # & Marked        | # 4  |                  |
| Comment:                        |  |                  |
| Corrective Action:              |  | Date:            |
| Type: Ancillary equipment       | # 1  |                  |
| Comment:                        | Chemical tank on containment   |                  |
| Corrective Action:              |  | Date:            |

**Tanks and Berms:**

|                    |  |          |                  |         |                  |
|--------------------|--|----------|------------------|---------|------------------|
| Contents           | #  | Capacity | Type             | Tank ID | SE GPS           |
| CRUDE OIL          | 1  | 300 BBLS | HEATED STEEL AST |         | ,                |
| Comment:           | Open end load line   |          |                  |         |                  |
| Corrective Action: | All load lines or tank valves that can be used as a load line will be capped or plugged. |          |                  |         | Date: 01/23/2024 |

**Paint**

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

**Berms**

|                    |   |                     |                     |                  |
|--------------------|---|---------------------|---------------------|------------------|
| Type               | Capacity  | Permeability (Wall) | Permeability (Base) | Maintenance      |
| Metal              | Inadequate  |                     |                     |                  |
| Comment:           | Secondary containment is not sufficiently impervious to contain spilled or released materials.                |                     |                     |                  |
| Corrective Action: | Install liner material to ensure spill or released materials will be maintained within containment structure. |                     |                     | Date: 06/30/2023 |

|                    |   |          |           |         |        |
|--------------------|---|----------|-----------|---------|--------|
| Contents           | # | Capacity | Type      | Tank ID | SE GPS |
| PRODUCED WATER     | 1 | 300 BBLS | STEEL AST |         | ,      |
| Comment:           |   |          |           |         |        |
| Corrective Action: |   |          |           |         | Date:  |

**Paint**

|                    |          |                     |                     |             |       |
|--------------------|----------|---------------------|---------------------|-------------|-------|
| Condition          | Adequate |                     |                     |             |       |
| Other (Content)    |          |                     |                     |             |       |
| Other (Capacity)   |          |                     |                     |             |       |
| Other (Type)       |          |                     |                     |             |       |
| <b>Berms</b>       |          |                     |                     |             |       |
| Type               | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |       |
| Metal              | Adequate |                     |                     |             |       |
| Comment:           |          |                     |                     |             |       |
| Corrective Action: |          |                     |                     |             | Date: |
| <b>Venting:</b>    |          |                     |                     |             |       |
| Yes/No             | NO       |                     |                     |             |       |
| Comment:           |          |                     |                     |             |       |
| Corrective Action: |          |                     |                     |             | Date: |
| <b>Flaring:</b>    |          |                     |                     |             |       |
| Type               |          |                     |                     |             |       |
| Comment:           |          |                     |                     |             |       |
| Corrective Action: |          |                     |                     |             | Date: |

| Inspected Facilities |                                |       |      |             |           |         |    |               |    |
|----------------------|--------------------------------|-------|------|-------------|-----------|---------|----|---------------|----|
| Facility ID:         | 260089                         | Type: | WELL | API Number: | 103-10132 | Status: | PR | Insp. Status: | PR |
| Producing Well       |                                |       |      |             |           |         |    |               |    |
| Comment:             | January 2024 Production Report |       |      |             |           |         |    |               |    |
| 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 |
|------------------|-----------------|-------------------------|-----------------------|--|--------------------------|---------|
|                  |                 |                         |                       | Material Handling And Spill Prevention |                          |         |
|                  |                 | Ditches                 |                       |  |                          |         |
| Ditches          |                 |                         |                       |  |                          |         |

Comment: Operator is responsible for maintaining Best Management Practices (BMPs) to control vehicle tracking and potential sediment discharges from operational roads, well pads, and other unpaved surfaces.

Corrective Action:

Date:

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   |
|--------------|----------------------|---|
| 403726760    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6475650">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6475650</a> |
| 702502498    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6475636">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6475636</a> |