

**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:

01/28/2025

Submitted Date:

01/29/2025

Document Number:

715501201

**FIELD INSPECTION FORM**

Loc ID: 312891 Inspector Name: Burchett, Kirby 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:**

ECMC Operator Number: 56680  
Name of Operator: MERRION OIL & GAS CORP  
Address: 610 REILLY AVENUE  
City: FARMINGTON State: NM Zip: 87401

**Findings:**

- 24 Number of Comments
- 13 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            |
|-------------------|----------------|----------------------------------|--------------------|
| Thompson, Philana | (505) 324-5300 | pthompson@merrion.bz             |                    |
| Haverkamp, Curtis | (720) 786-5560 | curtis.haverkamp@state.co.us     | Moffat Engineering |
| Engineering, ECMC |                | dnr_cogccengineering@state.co.us |                    |
| Wilson, Justin    | (970) 878-3825 | jrwilson@blm.gov                 |                    |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name              | Insp Status |
|-------------|------|--------|-------------|------------|-----------|----------------------------|-------------|
| 222772      | WELL | PR     | 02/01/2021  | OW         | 081-06132 | NIGHTINGALE-GOVERNMENT B-1 | PR          |

**General Comment:**

[ECMC Inspection Report Summary](#)

On Tuesday, 01/28/2025, Inspector Kirby Burchett, conducted a routine audit and field inspection at Merrion Oil & Gas Corp on the Nightingale-Government B-1 well, Location #312891, in Moffat County, Colorado.

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

Any Corrective Actions from previous Inspections are still applicable.

While there during normal operations the following compliance issues were observed:

1. Debris
2. Unlabeled containers
3. Damaged tank label
4. No sign at tank battery
5. Containments open to wildlife
6. Multiple areas of oily waste and stained soil
7. Open end load line
8. Unprotected vent riser
9. Tank backpressure valve damaged
10. Gas flaring through ECD

Refer to Inspection Photos for observed compliance issues.

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:

| <b>Signs/Marker:</b> |  |       |            |
|----------------------|--|-------|------------|
| Type                 | CONTAINERS   |       |            |
| Comment:             | Unlabeled containers   |       |            |
| Corrective Action:   | Containers that are used to store, treat, or otherwise handle a hazardous material and which are required to be marked, placarded, or labeled in accordance with the U.S. Department of Transportation's Hazardous Materials Regulations, will retain the markings, placards, and labels on the Container. Such markings, placards, and labels will be retained on the Container until it is sufficiently cleaned of residue and purged of vapors to remove any potential hazards.                               | Date: | 02/08/2025 |
| Type                 | TANK LABELS/PLACARDS   |       |            |
| Comment:             | Damaged and illegible labels   |       |            |
| Corrective Action:   | Operators will ensure that container and tank labels are well maintained and legible, and will replace damaged or vandalized labels within 10 days of discovery that the label is no longer legible or is damaged.   | Date: | 02/08/2025 |
| Type                 | BATTERY  |       |            |
| Comment:             | No sign at tank battery  |       |            |
| Corrective Action:   | The Tank battery sign will be no less than 3 square feet and no more than 6 square feet, and will provide: Name of the Operator; Telephone number at which the Operator can be reached at all times; Telephone number for local emergency services (911 where available); The public road used to access the Tank battery site; Well name(s) and API number(s) associated with the Tank battery and the legal location of the Well(s); and Location, including the quarter/quarter section, of the Tank battery. | Date: | 02/28/2025 |
| Type                 | WELLHEAD   |       |            |
| Comment:             |  |       |            |
| Corrective Action:   |  | Date: |            |

|                                  |              |       |  |
|----------------------------------|--------------|-------|--|
| <b>Emergency Contact Number:</b> |              |       |  |
| Comment:                         | 505-324-5300 |       |  |
| Corrective Action:               |              | Date: |  |

| <b>Good Housekeeping:</b> |   |       |            |
|---------------------------|---|-------|------------|
| Type                      | OTHER   |       |            |
| Comment:                  | Containments lacking wildlife protection  |       |            |
| Corrective Action:        | Install wildlife protection equipment.  | Date: | 02/08/2025 |
| Type                      | DEBRIS  |       |            |
| Comment:                  | Random debris   |       |            |
| Corrective Action:        | All excess materials, rubbish, supplies, trash, or other waste material will be properly contained until removed from the Oil and Gas Location. At no time will debris be placed or remain on the ground. | Date: | 02/05/2025 |

Overall Good:

| <b>Spills:</b>     |   |        |            |
|--------------------|---|--------|------------|
| Type               | Area  | Volume |            |
| Crude Oil          | WELLHEAD  |        |            |
| Comment:           | Oily waste and stained soil   |        |            |
| Corrective Action: | Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility. | Date:  | 02/13/2025 |
| PW/CO              | Treater   |        |            |

|                    |   |       |            |
|--------------------|---|-------|------------|
| Comment:           | Stained soil at treater drain valve   |       |            |
| Corrective Action: | Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility. | Date: | 02/13/2025 |
| Crude Oil          | Tank  |       |            |
| Comment:           | Oily waste and stained soil inside tank berm  |       |            |
| Corrective Action: | Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility. | Date: | 02/13/2025 |
| Lube Oil           | Pump Jack   |       |            |
| Comment:           | Oily waste and staining on all sides of pumping unit engine   |       |            |
| Corrective Action: | Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility. | Date: | 02/13/2025 |

In Containment: No

Comment:

Multiple Spills and Releases?

| <b>Equipment:</b>               |   |       | corrective date |
|---------------------------------|---|-------|-----------------|
| Type: Prime Mover               | # 1   |       |                 |
| Comment:                        | Recirculating pump inside tank berm   |       |                 |
| Corrective Action:              |   | Date: |                 |
| Type: Horizontal Heater Treater | # 1   |       |                 |
| Comment:                        | Unprotected relief vent riser   |       |                 |
| Corrective Action:              | Vents on pressure safety devices will terminate in a manner so as not to endanger the public or adjoining facilities. They will be designed to be clear and free of debris and water at all times.  | Date: | 02/13/2025      |
| Type: VRT                       | # 1   |       |                 |
| Comment:                        |   |       |                 |
| Corrective Action:              |   | Date: |                 |
| Type: Emission Control Device   | # 1   |       |                 |
| Comment:                        | Production records show all gas as being used. ECD flaring a large volume of gas. Venting and Flaring of natural gas represent waste of an important energy resource and pose safety and environmental risks. Venting and Flaring, except as specifically allowed in this Rule 903, are prohibited. |       |                 |
| Corrective Action:              | Verify with area engineer if volume is acceptable. A Gas Capture Plan may be required.  | Date: | 02/28/2025      |
| Type: Bird Protectors           | # 4   |       |                 |
| Comment:                        |   |       |                 |
| Corrective Action:              |   | Date: |                 |
| Type: Pump Jack                 | # 1   |       |                 |
| Comment:                        |   |       |                 |
| Corrective Action:              |   | Date: |                 |
| Type: Bradenhead                | # 1   |       |                 |
| Comment:                        |   |       |                 |
| Corrective Action:              |   | Date: |                 |
| Type: Deadman # & Marked        | # 2   |       |                 |
| Comment:                        |   |       |                 |
| Corrective Action:              |   | Date: |                 |

|                           |  |       |
|---------------------------|--|-------|
| Type: Ancillary equipment | # 2  |       |
| Comment:                  | Unlabeled containers on stands inside unprotected containments |       |
| Corrective Action:        |  | Date: |

**Tanks and Berms:**

| Contents           | # | Capacity | Type             | Tank ID | SE GPS |
|--------------------|---|----------|------------------|---------|--------|
| CRUDE OIL          | 1 | 300 BBLs | HEATED STEEL AST |         | ,      |
| Comment:           |   |          |                  |         |        |
| Corrective Action: |   |          |                  |         | Date:  |

**Paint**

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

**Berms**

| Type               | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|--------------------|----------|---------------------|---------------------|-------------|
| Earth              | Adequate |                     |                     |             |
| Comment:           | Unlined  |                     |                     |             |
| Corrective Action: |          |                     |                     | Date:       |

| Contents           | #  | Capacity | Type             | Tank ID | SE GPS           |
|--------------------|--|----------|------------------|---------|------------------|
| CRUDE OIL          | 1  | OTHER    | 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: 02/03/2025 |

**Paint**

|                  |     |
|------------------|-----|
| Condition        |     |
| Other (Content)  |     |
| Other (Capacity) | 210 |
| Other (Type)     |     |

**Berms**

| Type               | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|--------------------|----------|---------------------|---------------------|-------------|
| Earth              | Adequate |                     |                     |             |
| Comment:           | Unlined  |                     |                     |             |
| Corrective Action: |          |                     |                     | Date:       |

| Contents           | #   | Capacity | Type             | Tank ID | SE GPS           |
|--------------------|---|----------|------------------|---------|------------------|
| PRODUCED WATER     | 1   | OTHER    | HEATED STEEL AST |         | ,                |
| Comment:           | Backpressure vent on top of tank damaged.<br>Appears swage nipple on top of tank may also be damaged. |          |                  |         |                  |
| Corrective Action: | Repair damaged equipment  |          |                  |         | Date: 02/03/2025 |

**Paint**

|                 |  |
|-----------------|--|
| Condition       |  |
| Other (Content) |  |

|                      |  |
|----------------------|--|
| Other (Capacity) 277 |  |
| Other (Type)         |  |

**Berms**

| Type  | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|---|----------|---------------------|---------------------|-------------|
| Earth   | Adequate |                     |                     |             |
| Comment: <span style="color:blue;">Unlined</span> |          |                     |                     |             |
| Corrective Action:                                |          |                     |                     | Date:       |

**Venting:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Flaring:**

|                    |   |       |  |
|--------------------|---|-------|--|
| Type               | Ignitor/Combustor   |       |  |
| Comment:           | <span style="color:blue;">Large volume of gas being flared. Production records indicate all gas is being used. Engineering to determine if a Gas Capture Plan is required.</span> |       |  |
| Corrective Action: |   | Date: |  |

**Inspected Facilities**

Facility ID: 222772 Type: WELL API Number: 081-06132 Status: PR Insp. Status: PR

**Producing Well**

Comment: [November 2024 Production Reported](#)

Corrective Action:

Date:

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**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: [Limited Stormwater inspection due to snow cover. 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 ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 404074629    | INSPECTION SUBMITTED | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895327">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895327</a> |
| 715501202    | Inspection Photos    | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895322">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895322</a> |
| 715501204    | ECD Video            | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895323">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895323</a> |