

**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:

02/04/2025

Submitted Date:

02/07/2025

Document Number:

717100095**FIELD INSPECTION FORM**Loc ID 327376 Inspector Name: Rollins, Grace On-Site Inspection ☐ 2A Doc Num: **Operator Information:**ECMC Operator Number: 47120Name of Operator: KERR MCGEE OIL & GAS ONSHORE LPAddress: P O BOX 173779City: DENVER State: CO Zip: 80217-**Status Summary:**

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

Findings:12 Number of Comments7 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
Mickelson, Erik		Erik_Mickelson@oxy.com	Oxy Environmental
Robinson, Taylor		taylor.robinson@state.co.us	
,		ECMCInspections@Oxy.com	All Inspections
Graber, Nikki		nikki.graber@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
246793	WELL	SI	07/01/2020	GW	123-14590	HERMAN UPRR 31-31 #1	SI
488803	TANK BATTERY	AC	12/19/2024		-	Herman UPRR 31-31 1 Facility	EI

General Comment:

ECMC Environmental Field Inspection Report Summary

Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Spill ID: 489153

Spill Name: Herman UPRR 31-31 1

Remediation Project #: 37871

Wellhead API #: 05-123-14590

Facility ID: 327376

Reported Date of Discovery: 01/08/2025

Date of Inspection: 02/04/2025

Spill is located within or adjacent to:

-Surface water

-Livestock rangeland

Current site status:

-Signage with emergency contact number is present at the tank battery.

-NFPA placards are visible on the production tank and at the produced water vault.

-Staining was observed around the produced water vault. Petroleum hydrocarbon odor was observed when stained soil was disturbed.

-Fluid is not visible on the surface in the area of stained soil; migration to the subsurface is suspected.

-The production tank/produced water vault berm exhibited signs of degradation including surface cracks, multiple rodent burrows, and loose material which was easily disturbed by walking.

-Metal fencing and orange construction fencing have been installed at the former wellhead excavation but do not encompass the entire perimeter of the excavation.

-Excavation at the former wellhead remains open with snow accumulation.

-No environmental impacts were visible in situ at the former wellhead location.

-Unmarked soil was stockpiled adjacent to the former wellhead excavation location with inadequate stormwater BMPs.

-Soil vapor sample locations were visible adjacent to the former wellhead excavation.

-A riser was visible adjacent to the former wellhead excavation.

-Soil in the approximate location of Spill ID 489153 was moist and lower than the surrounding grade.

-Spots of black staining were visible in the approximate location of Spill ID 489153.

-Salt crusting was visible adjacent to the spill location.

-Soil on the separator berm, adjacent to Spill ID 489153 was observed disturbed. Degradation documented in Field Inspection Report 717900095 remains.

-Rodent burrow observed in separator berm.

-Debris observed within the production tank/produced water vault berm and adjacent to the former wellhead and soil stockpile area.

-Trash observed on location.

-Livestock manure observed on location.

See attached corrective actions. A Supplemental Form 27 is required. Supplemental Form 19 identifying the root cause of Spill ID 489153 is required, due 04/08/2025.

LocationOverall Good: ☐

Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	NFPA placards are visible on the production tank and at the produced water vault.		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:	Signage with emergency contact number is present at the tank battery.		
Corrective Action:		Date:	

Good Housekeeping:			
Type	DEBRIS		
Comment:	Debris observed within the production tank/produced water vault berm and adjacent to the former wellhead and soil stockpile area. Trash observed on location.		
Corrective Action:	Comply with Rule 606.	Date:	02/14/2025

Overall Good: ☐

Spills:				
Type	Area	Volume		
Produced Water				
Comment:	Staining was observed around the produced water vault. Petroleum hydrocarbon odor was observed when stained soil was disturbed.			
Corrective Action:	Properly dispose of oily waste in accordance with 905.e and, if applicable, report in accordance with 912.			Date:

In Containment: No

Comment: Fluid is not visible on the surface in the area of stained soil; migration to the subsurface is suspected. Therefore, the spill is not fully contained.

☐ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		
Comment:	Metal fencing and orange construction fencing have been installed at the former wellhead excavation but do not encompass the entire perimeter of the excavation.		
Corrective Action:	Operator shall continuously monitor and maintain [BMPs] to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECMC Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions (e.g. livestock) when sites are not attended.		Date:

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	

Other (Type)						
Berms						
Type	Capacity	Permeability (Wall)		Permeability (Base)	Maintenance	
Comment:		Separator berm degradation documented in Field Inspection Report 717900095 remains.				
Corrective Action:		Repair or install berms or other secondary containment devices per Rule 912.d.(1). CA due date backlisted per Field Inspection Report 717900095.				Date: 12/03/2024
Contents	#	Capacity	Type	Tank ID	SE GPS	
Comment:						
Corrective Action:						Date:
Paint						
Condition						
Other (Content)						
Other (Capacity)						
Other (Type)						
Berms						
Type	Capacity	Permeability (Wall)		Permeability (Base)	Maintenance	
Comment:		The production tank/produced water vault berm exhibited signs of degradation including surface cracks, multiple rodent burrows, and loose material which was easily disturbed by walking.				
Corrective Action:		Repair or install berms or other secondary containment devices per Rule 912.d.(1).				Date: 02/21/2025
Venting:						
Yes/No						
Comment:						
Corrective Action:					Date:	
Flaring:						
Type						
Comment:						
Corrective Action:					Date:	

Inspected Facilities									
Facility ID:	246793	Type:	WELL	API Number:	123-14590	Status:	SI	Insp. Status:	SI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	488803	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Remediation Project No. 37871 was created for the plugging and abandonment of the Herman UPRR 31-31 1 wellhead and the removal of the associated flowline. A small excavation remains open at the location of the former wellhead. No environmental impacts were visible in situ and snow had accumulated within the open excavation at the former wellhead. Quarterly reporting is required under Remediation Project No. 37871; the last Form 27 for this project was submitted 01/15/2025 and denied 01/30/2025 (Document No. 404058384). Spill ID 489153 was created for the fluid observed daylighting from the associated flowline. Soil in the approximate location of Spill ID 489153 was moist and lower than the surrounding grade. Spots of black staining were visible in the approximate location of Spill ID 489153. Salt crusting was visible adjacent to the spill location. A Supplemental Form 19 identifying the root cause of Spill ID 489153 is required, due 04/08/2025.

Corrective Action: **Operator shall provide an updated Form 27 for Remediation Project No. 37871.**

Date: 02/21/2025

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type _____ Management _____ Condition _____ GPS (Lat) (Long) _____

	Piles	Inadequate			
Comment	Unmarked soil was stockpiled adjacent to the former wellhead excavation location with inadequate stormwater BMPs.				
Corrective Action	Install or repair required BMPs per Rule 1002.f.(2)C.				Date: 02/21/2025

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

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

Document Num	Description	URL
717100098	ECMC Photo Log - Herman UPRR 31-31 1	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6909694