

**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
Robinson, Taylor		taylor.robinson@state.co.us	
,		ECMCInspections@Oxy.com	<a href="#">All Inspections</a>
Graber, Nikki		nikki.graber@state.co.us	
Mickelson, Erik		Erik_Mickelson@oxy.com	<a href="#">Oxy Environmental</a>

**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.

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
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:	

<b>Good Housekeeping:</b>			
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: ☐

<b>Spills:</b>			
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: 03/09/2025

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?

<b>Fencing/:</b>			
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: 02/21/2025

**Tanks and Berms:**

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

**Paint**

Condition	
Other (Content)	
Other (Capacity)	

Other (Type) _____						
<b><u>Berms</u></b>						
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
Contents	#	Capacity	Type	Tank ID	SE GPS	
Comment:						
Corrective Action:						Date:
<b><u>Paint</u></b>						
Condition						
Other (Content)						
Other (Capacity)						
Other (Type)						
<b><u>Berms</u></b>						
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
<b><u>Venting:</u></b>						
Yes/No						
Comment:						
Corrective Action:					Date:	
<b><u>Flaring:</u></b>						
Type						
Comment:						
Corrective Action:					Date:	



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

Document Num	Description	URL
404085899	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6909695">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6909695</a>
717100098	ECMC Photo Log - Herman UPRR 31-31 1	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6909694">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6909694</a>