

**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:

02/25/2025

Submitted Date:

03/03/2025

Document Number:

710500455**FIELD INSPECTION FORM**Loc ID 414280 Inspector Name: Sanchez, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10722Name of Operator: KTM OPERATING LLCAddress: 2851 JOHNSTON ST PMB 550City: LAFAYETTE State: LA Zip: 70503**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**5 Number of Comments1 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
Hecht, Jaime	832-531-1711	jaime.hecht@dynacloud.io	
Welsh, Brian		brian.welsh@state.co.us	
Quint, Craig		craig.quint@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Vincent, Kenny	(337) 654-9404	kvincent@reagan.com	Principal Agent

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159331	UIC DISPOSAL	AC	03/11/2010		-	CRAIG 6-4 SWD	EI
414278	WELL	IJ	04/01/2023	DSPW	073-06391	CRAIG 6-4 SWD	EI
479428	SPILL OR RELEASE	CL	02/18/2021		-	Craig 6-4 SWD	EI

**General Comment:**

This is an Environmental Inspection for the Craig 6-4 SWD API # 02-073-06391, Spill ID 479428 Open Remediation Project # 17974



**Environmental****Spill/Remediation:**

**Comment:** This is an Environmental Inspection for the Craig 6-4 SWD Remediation Project # 17974. Rem Project # 17974 was assigned to the Craig 6-4 SWD, Location ID 414280 on 05/08/2021. Spill ID 479428, was closed on 7/22/2021 under Form 19 Document # 402745410 transferring spill remediation efforts to Remediation Project # 17974. ECMC comment in Form 19 Doc # 402745410 states, "Clean up is occurring under approved remediation. See Remediation 17974 for further information"...

The Operator has not complied with the Quarterly reporting schedule for Rem Project # 17974 since 05/08/2021 when the Form 27 initial was filed.

At the time of inspection, impacted soils were observed within the secondary containment for the Tank Battery. In addition, the Operator has not provided Confirmation Soil Samples for the areas impacted by Spill ID 479428 depicted in location photos attached to Form 19 Document # 402614154.

The Operator shall immediately file a Supplemental Form 27 for Rem Project # 17974 with a detailed sampling plan and a standalone implementation schedule for the remediation of impacted soils.

Quarterly reporting shall be conducted until the site demonstrates compliance with Table 915-1 standards.

Failure to comply with quarterly reporting schedule may result in enforcement actions.

**Corrective Action:**

Contact area EPS within 72 hours for directives.

Date: 03/06/2025

Operator shall comply with Rule 905 for E&P Waste Managment, Rule 913 SITE INVESTIGATION, REMEDIATION, AND CLOSURE and Rule 915 CONCENTRATIONS AND SAMPLING FOR SOIL AND GROUNDWATER

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**ECMC Comments**

Comment	User	Date
Per Rule 913.e.Reporting Schedule. After initial approval of a Form 27, the Operator will provide quarterly updatereports in a Supplemental Form 27 to document progress of site investigation and Remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.	sanchezcc	03/03/2025
Form 27 Supplemental is 1,305 days late.	sanchezcc	03/03/2025

**Attached Documents**

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

Document Num	Description	URL
404114017	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6942889">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6942889</a>
710500456	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6942877">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6942877</a>