

**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:

06/26/2025

Submitted Date:

06/30/2025

Document Number:

718300017

FIELD INSPECTION FORMLoc ID 317229 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 10690

Name of Operator: IMPETRO RESOURCES LLC

Address: 558 CASTLE PINES PKWY UNIT B-4

City: CASTLE PINES State: CO Zip: 80108

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

12 Number of Comments

6 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
Waggoner, Kyle		kyle.waggoner@state.co.us	
Bongers, Brent	361-935-5633	bbongers@impetroresources.com	All Inspections
Heibel, Krystal		krystal.heibel@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
107553	PIT	AC			-	STATE 4	EI
107554	PIT	AC			-	STATE 4	EI
446492	SPILL OR RELEASE	AC			-	SPILL/RELEASE POINT	EI
454306	SPILL OR RELEASE	AC			-	SPILL/RELEASE POINT	EI
456489	SPILL OR RELEASE	AC			-	STATE 4 TANK BATTERY	EI
480898	SPILL OR RELEASE	AC	10/08/2021		-	FWKO	EI

General Comment:

ECMC Field Inspection Report Summary

On June 26th, 2025, ECMC Environmental Protection Specialist Laurel Anderson performed an environmental inspection of the State 4 Tank Battery (Location ID 317229) to determine progress on Spill IDs: 480898, 454306, 456489 and 446492. 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.

Location ID: 317229

Location Name: STATE-63S52W/3SESW

Pit ID 107553

Pit ID 107554

Spill/Release Points:

-Spill (Spill ID 446492)

Date of Discovery: 7/3/2016 (90 day closure due date: 10/1/2016)

Lat/Long: 39.814102 / -103.193498

19i Doc #: 401073130

Days Open (as of 6/30/2025): 3,284 days

-Spill (Spill ID 456489)

Date of Discovery: 7/31/2018 (90 day closure due date: 10/29/2018)

Lat/Long: 39.814083 / -103.193558

19i Doc #: 401721720

Days Open (as of 6/30/2025): 2,526 days

-Spill (Spill ID 454306)

Date of Discovery: 3/8/2018 (90 day closure due date: 6/6/2018)

Lat/Long: 39.814040 / -103.193812

19i Doc #: 401570138

Days Open (as of 6/30/2025): 2,671 days

-FWKO (Spill ID 480898)

Date of Discovery: 9/27/2021 (90 day closure due date: 12/26/2021)

Lat/Long: 39.814074 / -103.193876

19i Doc #: 402825653

Days Open (as of 6/30/2025): 1,372 days

Tank battery is located within or adjacent to:

-Crop land & County Road

Current site status:

-Weeds (Photos 1-2, 6-9, 11-14, & 16)

-Inadequate secondary containment (Photos 1-5, 9 & 13)

-Erosion/Sediment transport (Photos 6-14 & 19)

-Stained Soil (12 & 15-18)

-Inadequate Signage/Placards/Labels (Photos 1 & 9)

-Multiple Open/Unresolved Spills

See attached corrective actions.

LocationOverall Good: ☐**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	Inadequate Signage/Placards/Labels (Photos 1 & 9). All ASTs/Separators have one or more faded or missing: NFPA placards, tank contents/volume labels		
Corrective Action:	Install sign to comply with Rule 605.h.	Date:	07/30/2025

Emergency Contact Number:

Comment:			
Corrective Action:		Date:	

Good Housekeeping:

Type	WEEDS		
Comment:	Weeds observed on location (Photos 1-2, 6-9, 11-14, & 16)		
Corrective Action:	Comply with Rule 606.c.	Date:	07/14/2025
Type	OTHER		
Comment:	Stained soil identified at various locations (12 & 15-18)		
Corrective Action:	Comply with ECMC Rules Rule 608.e. & 1002.F.(2).D. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.	Date:	07/07/2025

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

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

Paint

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate

Comment:	Inadequate secondary containment (Photos 1-5, 9 & 13) for: -(2) two 300-bbl vertical steel crude oil ASTs, -(2) two ~300-bbl vertical steel produced water ASTs, -(2) separators - (1) one unknown volume horizontal FWKO and (1) one unknown volume vertical heater treater. Earthen secondary containment berms are not adequately sized to contain the entire volume of the largest tank plus freeboard allowance. Earthen secondary containment berm (s) is(are) not sufficiently impervious to contain spills/releases.	
Corrective Action:	Repair and maintain berms in accordance with Rule 603.o.	Date: 07/30/2025

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Environmental			
Spills/Releases:			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:	Multiple Open/Unresolved Spills. Spill IDs: 480898, 454306, 456489 and 446492. Pursuant to Rule 912.b.(6) Operator was required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure. The Form 19 Supplemental Reports for closure of all four spills are past due. See Location Summary for more information.		
Corrective Action:	Operator shall submit delinquent forms for these spills.		Date: 07/14/2025
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: _____	

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: Erosion/Sediment transport (Photos 6-14 & 19). Stormwater management sediment and erosion control are required.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 07/15/2025

Pits: ☐ NO SURFACE INDICATION OF PIT

Type: Skimming/Settling Lined: NO Pit ID: 107553 Lat: 39.813922 Long: -103.194018

Reference Point: SE Other: Corner Length: 60 Width: 30

Lining:

Liner Type: Liner Condition: Inadequate

Comment: Former skim pit closed between 2006 and 2011. Pit status will remain active until site investigation and remediation are complete. Stained soil observed along sidewalls of excavation/pit to the east of the produced water pit (Pit ID 107554) and north of produced water ASTs. Note: A Form 27 was required at the time of closure.

Corrective Action Date:

Fencing:

Fencing Type: None Fencing Condition:

Comment:

Corrective Action Date:

Netting:

Netting Type: Netting Condition:

Comment:

Corrective Action Date:

Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard:

Comment:

Corrective Action Date:

Type: Produced Water Lined: NO Pit ID: 107554 Lat: Long:

Reference Point: SE Other: Corner of pit Length: 100 Width: 60

Lining:

Liner Type: Liner Condition:

Comment: No liner. Earthen produced water pit - walls are eroding and require maintenance.

Corrective Action Date:

Fencing:

Fencing Type: None Fencing Condition:

Comment:

Corrective Action Date:

Netting:		
Netting Type:	Netting Condition:	
Comment:	No netting	
Corrective Action		
	Date:	
Anchor Trench Present:	Oil Accumulation: <u>NO</u>	2+ feet Freeboard: <u>YES</u>
Comment:		
Corrective Action		
	Date:	

ECMC Comments

Comment	User	Date
Weather: Sunny 80F slight breeze PPE: Level D + FR	andersoln	06/30/2025

Attached Documents

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

Document Num	Description	URL
404262413	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7122132
718300018	2025_0626_State 4 Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7122130
718300019	Historic Google Earth Imagery of Pits	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7122131