

CECMC Inspection/Audit Report Summary

On 07/21/2025 at approximately 12:43 hours, Compliance Inspector Dusty Popejoy conducted an on-site inspection/audit at RETAMCO OPERATING INC PHILADELPHIA CREEK 21 PAD at Location ID #315358 in Rio Blanco County, Colorado.

This location is within or in close proximity to, a CPW Density/High Priority Habitat, Black Bear, NSO Habitat, or Wildlife Management area.

During the inspection/audit, the following compliance issues were observed:

1. Equipment - Multiple holes in separator building & heater open to wildlife/available for entry by wildlife with a CA date of 08/3/2025
2. Equipment - PRV vent line does not comply with CECMC pressure safety device rules with a CA date of 08/3/2025
3. Pits - 2 unlined pits on location do not have location ID's/do not appear to be in the CECMC database with a CA date of 08/10/2025
4. Stormwater - Failure to minimize erosion & transport of sediment off location/insufficient BMP's with a CA date of 08/11/2025
5. Signs/Marker - Wellhead sign lacks quarter/quarter section information/not in compliance with CECMC rules with a CA date of 08/27/2025
6. Inspected Facilities - Well lacks wellbore diagram/not in compliance with CECMC rules with a CA date of 08/27/2025

A follow-up on this site inspection/audit will be conducted to ensure the compliance issues have been corrected to comply with CECMC rules.

Location			
Lease Road:			
Type	Access		
comment:	Access		
Corrective Action:			Date:
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	OTHER		
Comment:	Sign at entrance to location lacks quarter/quarter section information		
Corrective Action:			Date:
Type	WELLHEAD		
Comment:	Wellhead sign lacks quarter/quarter section information/not in compliance with CECMC rules		
Corrective Action:	Comply with CECMC Signage rules		Date: 08/27/2025
Emergency Contact Number:			
Comment:	406-446-1568/911		
Corrective Action:			Date: _____
Good Housekeeping:			
Type	DEBRIS		
Comment:	Debris on location		
Corrective Action:			Date:
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	PIT		
Comment:	Livestock		
Corrective Action:			Date:
Equipment:			
Type: Bradenhead	# 1		corrective date
Comment:	No form of pressure monitoring equipment. Bradenhead valve is accessible		
Corrective Action:			Date:
Type: Gas Meter Run	# 1		
Comment:			
Corrective Action:			Date:
Type: Other	# 1		
Comment:	PRV vent line does not comply with CECMC pressure safety device rules		

Corrective Action:	Comply with CECMC pressure safety device rules	Date:	08/03/2025
Type: Bird Protectors	# 1		
Comment:			
Corrective Action:		Date:	
Type: Deadman # & Marked	# 3		
Comment:	1 unmarked deadman - All guy line anchors left buried for future use will be identified by a marker of bright color not less than 4 feet in height and not greater than 1 foot east of the guy line anchor.		
Corrective Action:		Date:	
Type: Other	# 4		
Comment:	Multiple holes in separator building & heater open to wildlife/available for entry by wildlife		
Corrective Action:	Comply with CECMC wildlife rules	Date:	08/03/2025
Type: Horizontal Heated Separator	# 1		
Comment:			
Corrective Action:		Date:	

Venting:

Yes/No	NO		
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 230694 Type: WELL API Number: 103-08362 Status: PR Insp. Status: PR

Producing Well

Comment: [Producing well](#)
[Inspected Facilities - Well lacks wellbore diagram/not in compliance with CECMC rules](#)

Corrective Action: [Comply with CECMC Rule 420 & submit wellbore diagrams via FORM 4 SUNDRY or FORM 17](#)

Date: 08/27/2025

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
		Compaction				Light compaction
		Berms				
Berms						
		Ditches				
Compaction						Light compaction
Other	Fail					Failure to minimize erosion/insufficient BMP's

Comment: [1. Failure to minimize erosion & transport of sediment off location/insufficient BMP's](#)

Corrective Action: [Comply with CECMC Stormwater rules](#)

Date: 08/11/2025

Pits: NO SURFACE INDICATION OF PIT

Type: Blowdown Lined: NO Pit ID: Lat: Long:

Reference Point: Other: Length: Width:

Lining:

Liner Type: Liner Condition:

Comment:

[2 unlined pits on location do not have location ID's/do not appear to be in the CECMC database. Unable to locate permits for pits in the CECMC database/not in compliance with CECMC rules](#)

[Wellhead pit - Lat Long 39.876235, -108.711757](#)
[Separator pit - Lat Long 39.876480, -108.711560](#)

Corrective Action

[Comply with CECMC 900 series rules](#)

Date: 08/10/2025

Fencing:

Fencing Type: Livestock Fencing Condition: Adequate

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:

ECMC Comments

Comment	User	Date
Please refer to Equipment, Pits, Stormwater & Inspected Facilities for corrective actions and comments.	popejoyd	07/27/2025

Attached Documents

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

Document Num	Description	URL
404295137	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7163069
713400933	713400932 Inspection-Audit Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7163064