

**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:

07/21/2025

Submitted Date:

07/28/2025

Document Number:

713400934

FIELD INSPECTION FORM

Loc ID 315359 Inspector Name: Popejoy, Dusty On-Site Inspection 2A Doc Num: _____

Status Summary:

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

Operator Information:

ECMC Operator Number: 74290
Name of Operator: RETAMCO OPERATING INC
Address: PO BOX 790
City: RED LODGE State: MT Zip: 59068

Findings:

- 19 Number of Comments
- 7 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
Katz, Aaron		aaron.katz@state.co.us	
Heil, John		john.heil@state.co.us	
Koch, Benjamin		bzkoch@blm.gov	
OPERATING, RETAMCO		tomgose@retamco.com	
Kellerby, Shaun		shaun.kellerby@state.co.us	
Haverkamp, Curtis		curtis.haverkamp@state.co.us	
OPERATING, RETAMCO		joeglennon@retamco.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
117162	PIT	AC			-	PHILADELPHIA CREEK 22	AC
230695	WELL	PR	06/01/2021	GW	103-08363	PHILADELPHIA CREEK 22	PR

General Comment:

CECMC Inspection/Audit Report Summary

On 07/21/2025 at approximately 15:13 hours, Compliance Inspector Dusty Popejoy conducted an on-site inspection/audit at RETAMCO OPERATING INC PHILADELPHIA CREEK 22 PAD at Location ID #315359 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. Housekeeping - Unused equipment - Chemical tank is not in use/unused equipment, additionally tank port is open to wildlife/available for entry by wildlife. Also tank label lacks required information and is not legible/not in compliance with CECMC rules with a CA date of 08/4/2025
2. Tanks and Berms - Open ended piping & hole in top of tank/wildlife hazard/available for entry by wildlife with a CA date of 08/4/2025
3. Equipment - PRV vent lines do not comply with CECMC pressure safety device rules with a CA date of 08/4/2025
4. Housekeeping - Weeds/undesirable plant species surrounding production equipment constitutes a fire hazard with a CA date of 08/4/2025
5. Pits - It appears that Pit Facility ID 117162 is being utilized as secondary containment for the 72 bbl produced water tank on location with a CA date of 08/11/2025
6. Signs/Marker - Battery sign is in disrepair and lacks quarter/quarter section information/not in compliance with CECMC rules with a CA date of 08/28/2025
7. Inspected Facilities - Well lacks wellbore diagram/not in compliance with CECMC rules with a CA date of 08/28/2025

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 ActionL		Date:	
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Battery sign is in disrepair and lacks quarter/quarter section information/not in compliance with CECMC rules		
Corrective Action:	Comply with CECMC Signage rules	Date:	08/28/2025
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	
Type	CONTAINERS		
Comment:	Chemical tank label lacks required information and is not legible/not in compliance with CECMC rules.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Sign on meter house lacks quarter/quarter section information		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:	406-446-1568/911		
Corrective Action:		Date:	_____
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Chemical tank is not in use/unused equipment, additionally tank port is open to wildlife/available for entry by wildlife. Also tank label lacks required information and is not legible/not in compliance with CECMC rules.		
Corrective Action:	Comply with CECMC wildlife rules & CECMC 600 series rules	Date:	08/04/2025
Type	WEEDS		
Comment:	Weeds/undesirable plant species surrounding production equipment constitutes a fire hazard		
Corrective Action:	Oil and Gas Locations will be kept free of all Undesirable Plant Species	Date:	08/04/2025
Type	DEBRIS		
Comment:	Debris on location		
Corrective Action:		Date:	
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:			corrective date
Type: Bird Protectors	# 1		
Comment:			
Corrective Action:			Date:
Type: Bradenhead	# 1		
Comment:	No form of pressure monitoring equipment. Bradenhead valve is accessible		
Corrective Action:			Date:
Type: Other	# 2		
Comment:	PRV vent lines do not comply with CECMC pressure safety device rules		
Corrective Action:	Comply with CECMC pressure safety device rules		Date: <u>08/04/2025</u>
Type: Deadman # & Marked	# 4		
Comment:			
Corrective Action:			Date:
Type: Ancillary equipment	# 1		
Comment:	Chemical tank		
Corrective Action:			Date:
Type: Gas Meter Run	# 1		
Comment:			
Corrective Action:			Date:
Type: Horizontal Heated Separator	# 1		
Comment:			
Corrective Action:			Date:

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	OTHER	STEEL AST		,
Comment:	Open ended piping & hole in top of tank/wildlife hazard/available for entry by wildlife Tank showing signs of rust. All in-service Tanks and process vessels will be inspected and maintained Tank not equipped with telemetry				
Corrective Action:	Comply with CECMC wildlife rules				Date: <u>08/04/2025</u>

Paint

Condition	Inadequate	
Other (Content)		
Other (Capacity)	72 bbls	
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth					
Comment:					
Corrective Action:				Date:	

Venting:

Yes/No	NO		
Comment:			
Corrective Action:			Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: 117162 Type: PIT API Number: - Status: AC Insp. Status: AC

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 230695 Type: WELL API Number: 103-08363 Status: PR Insp. Status: PR

Producing Well

Comment: Producing well

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: 08/28/2025

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
				Material Handling And Spill Prevention		Chemical tank containment
		Ditches				
Compaction						Light compaction
Berms						
		Culverts				
		Berms				
Ditches						

Comment:

Corrective Action:

Date: _____

Pits: NO SURFACE INDICATION OF PIT

Type: Blowdown Lined: NO Pit ID: Lat: 39.878966 Long: -108.702654

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: Liner Condition:

Comment: It appears that Pit Facility 117162 is being utilized as secondary containment for the 72 bbl produced water tank on location.

Corrective Action

Comply with CECMC Rule 909.a to ensure that the pit is properly permitted through a Form 15 approved by the Director, or registered in their names with an active Pit Facility ID, accurately mapped and listed according to current facility records in the Commission's database.

Date: 08/11/2025

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:

ECMC Comments

Comment	User	Date
Please refer to Equipment, Housekeeping, Tanks and Berms, Pits, Signs/Marker & Inspected Facilities for corrective actions and comments.	popejoyd	07/28/2025

Attached Documents

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

Document Num	Description	URL
404296851	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164533
713400935	713400934 Inspection-Audit Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7164521