

**FORM  
INSP**

Rev  
X/20

**State of Colorado  
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

03/17/2026

Submitted Date:

04/01/2026

Document Number:

709100631

**FIELD INSPECTION FORM**

Loc ID \_\_\_\_\_ Inspector Name: Heibel, Krystal On-Site Inspection  2A Doc Num: \_\_\_\_\_

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

**Findings:**  
 10 Number of Comments  
 8 Number of Corrective Actions  
 Corrective Action Response Requested

**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

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

| Contact Name   | Phone        | Email                         | Comment         |
|----------------|--------------|-------------------------------|-----------------|
| Grace Rollins  |              | grace.rollins@state.co.us     |                 |
| Lauren Glazier | 315-657-4720 | lglazier@cgrs.com             |                 |
| Kyle Waggoner  |              | kyle.waggoner@state.co.us     |                 |
| Krystal Heibel |              | krystal.heibel@state.co.us    |                 |
| Bongers, Brent | 361-935-5633 | bbongers@impetroresources.com | All Inspections |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|---------|---------------|-------------|
| 102632      | PIT  | AC     |             |            | -       | STENNETT 6-15 | EI          |

**General Comment:**  
 On March 17, 2026, ECMC staff Krystal Heibel and Grace Rollins conducted an inspection at the Stennett pits, including pit facility IDs: 102629, 102630, 102631, 102632, and 102633.  
 Five Form 15 (Earthen Pit Permit/Reports) were submitted on March 31, 2026, and have not been processed as of April 1, 2026.  
 Any corrective actions from previous inspections that have not been addressed are still applicable.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type

Comment: Unused equipment located at the facility

Corrective Action: Comply with Rule 606

Date: 04/09/2026

Overall Good:

**Spills:**

Type

Area

Volume

Comment: Hydrocarbon stained soil and signs of produced water releases observed on location.

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a.

Date: 05/01/2026

In Containment: No

Comment:

Multiple Spills and Releases?

**Equipment:**

corrective date

Type:

#

Comment: Open valves observed on location. Refer to photos 5, 7, 15, 16, and 17.

Corrective Action: Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.

Date: 04/16/2026

**Tanks and Berms:**

| Contents           | # | Capacity | Type | Tank ID | SE GPS |
|--------------------|---|----------|------|---------|--------|
|                    |   |          |      |         |        |
| 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: Berms contained large burrows (photo 24), were displaying signs of erosion (photos 42, 44 - 48, 53) and signs of sediment transport into the adjacent cropland (photo 49). Berms surrounding tank battery insufficient to contain potential wastes - see photo 13. |            |                     |                     |                  |
| Corrective Action: Repair berms or other secondary containment devices per Rule 912.d.  |            |                     |                     | Date: 05/11/2026 |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Venting:</b>    |  |       |  |
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

|                    |  |       |  |
|--------------------|--|-------|--|
| <b>Flaring:</b>    |  |       |  |
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Inspected Facilities**

Facility ID: 102632 Type: PIT API Number: - Status: AC Insp. Status: EI

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

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Hydrocarbon stained soils observed around the perimeter of pits and among berm material on location.

Corrective Action: Comply with Rule 909.e. Control and contain spills/releases and clean up per Rule 912.a. Date: 05/01/2026

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Waste Management:**

| Type              | Management   | Condition | GPS (Lat) (Long)        |
|-------------------|--|-----------|-------------------------|
|                   |  |           |                         |
| Comment           | <span style="border: 1px solid black; padding: 2px;">Salt kill observed within pit facility ID 102633. Refer to Photo 54.</span> |           |                         |
| Corrective Action | <span style="border: 1px solid black; padding: 2px;">Control and contain spills/releases and clean up per Rule 912.a.</span>     |           | Date: <u>05/01/2026</u> |

**Spill/Remediation:**

Comment:

Corrective Action:  Date: \_\_\_\_\_

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

Comment:

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

**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:

Corrective Action:

Date: \_\_\_\_\_

**Pits:**     NO SURFACE INDICATION OF PIT

|       |        |         |      |       |
|-------|--------|---------|------|-------|
| Type: | Lined: | Pit ID: | Lat: | Long: |
|-------|--------|---------|------|-------|

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment:

Corrective Action

Date: \_\_\_\_\_

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment:

Corrective Action

Date: \_\_\_\_\_

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment:

Corrective Action

Date: \_\_\_\_\_

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: \_\_\_\_\_ 2+ feet Freeboard: NO

Comment: Pit Facility IDs 102629, 102630, 102631, 102632, and 102633 are delinquent on Rule 909.j. Produced Water Quality Analysis.

Date: 05/15/2026

Corrective Action Beginning January 15, 2021, Operators will submit an initial water quality analysis for produced water for each Well from which produced water is placed into a permitted or registered Pit, including Pits that were constructed prior to January 15, 2021.

Corrective Action Operators will submit all water quality analysis data using a Form 43, Analytical Sample Submittal, and will include suitable electronic data deliverable generated by the laboratory and PDF of lab reports within 3 months of sample collection. Results for the initial samples collected pursuant to Rule 909.j.(1) will be submitted no later than July 15, 2022, or prior to Pit closure, whichever is earlier.

|       |        |                       |      |       |
|-------|--------|-----------------------|------|-------|
| Type: | Lined: | Pit ID: <u>102632</u> | Lat: | Long: |
|-------|--------|-----------------------|------|-------|

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment:

Corrective Action

Date: \_\_\_\_\_

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

|                        |   |                              |
|------------------------|---|------------------------------|
| Comment:               |   | Date:                        |
| Corrective Action      |   |                              |
| <b>Netting:</b>        |   |                              |
| Netting Type:          | Netting Condition:  |                              |
| Comment:               |   | Date:                        |
| Corrective Action      |   |                              |
| Anchor Trench Present: | Oil Accumulation:   | 2+ feet Freeboard: <u>NO</u> |
| Comment:               | <a href="#">Pit did not contain 2 feet of freeboard. Refer to photo 58.</a>   |                              |
| Corrective Action      | Operators will construct, monitor, and operate Pits to provide for a minimum of 2 feet of freeboard at all times between the top of the Pit wall at its point of lowest elevation and the Fluid level of the Pit. Operators will employ a method of monitoring and maintaining the freeboard. Operators will report any unauthorized Release of Fluids from a Pit pursuant to Rule 912. |                              |
|                        |   | Date: <u>04/03/2026</u>      |

**Attached Documents**

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

| Document Num | Description | URL   |
|--------------|-------------|---|
| 709100632    | Photos      | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7502215">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7502215</a> |