

**FORM  
INSP**Rev  
05/11**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

DE	ET	OE	ES
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Inspection Date:

05/19/2014

Document Number:

673400566

Overall Inspection:

**VIOLATION****FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	426354	426365	Waldron, Emily	<input type="checkbox"/>	

**Operator Information:**OGCC Operator Number: 10450Name of Operator: EE3 LLCAddress: 4410 ARAPAHOE AVENUE #100City: BOULDER State: CO Zip: 80303

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☐ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

Contact Name	Phone	Email	Comment
NEIDEL, KRIS		kris.neidel@state.co.us	
Ashby, Andy		aashby@ee3llc.com	
KELLERBY, SHAUN		shaun.kellerby@state.co.us	
McClure, Rich		rmcclure@ee3llc.com	

**Compliance Summary:**QtrQtr: SWSE Sec: 20 Twp: 8N Range: 80W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
01/21/2014	669300775	XX	WO	<b>ACTION REQUIRED</b>			No

**Inspector Comment:****Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
426354	WELL	DG	04/15/2014	LO	057-06515	Peterson Ridge #1-20H	PR	<input checked="" type="checkbox"/>

**Equipment:**Location Inventory

Special Purpose Pits: <u>        </u>	Drilling Pits: <u>        </u>	Wells: <u>1</u>	Production Pits: <u>        </u>
Condensate Tanks: <u>        </u>	Water Tanks: <u>2</u>	Separators: <u>2</u>	Electric Motors: <u>        </u>
Gas or Diesel Motors: <u>        </u>	Cavity Pumps: <u>2</u>	LACT Unit: <u>1</u>	Pump Jacks: <u>1</u>
Electric Generators: <u>1</u>	Gas Pipeline: <u>1</u>	Oil Pipeline: <u>1</u>	Water Pipeline: <u>        </u>
Gas Compressors: <u>        </u>	VOC Combustor: <u>1</u>	Oil Tanks: <u>5</u>	Dehydrator Units: <u>        </u>
Multi-Well Pits: <u>        </u>	Pigging Station: <u>        </u>	Flare: <u>1</u>	Fuel Tanks: <u>        </u>

**Location**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED	No labels on tanks.	Install sign to comply with rule 210.d.	06/19/2014
BATTERY	SATISFACTORY	At entrance.		
WELLHEAD	SATISFACTORY			

Emergency Contact Number (S/A/V): SATISFACTORY

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
STORAGE OF SUPL	ACTION REQUIRED	Frac tanks stored on location. Not bermed, not in use. Water truck and manlift parked by entrance. Tubing behind frac tanks.	Remove all equipment not necessary for production.	06/19/2014

<b>Spills:</b>				
Type	Area	Volume	Corrective action	CA Date
Crude Oil	Truck Loadout	<= 5 bbls	Stained gravel outside of tank berm. Remove, remediate in accordance with COGCC rules. Prevent future leaks and spills.	06/19/2014

☐ Multiple Spills and Releases?

<b>Fencing/:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
LOCATION	SATISFACTORY			

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Bird Protectors		SATISFACTORY			
Flare	1	SATISFACTORY			
Deadman # & Marked	4	SATISFACTORY			
Emission Control Device	1	SATISFACTORY			
Gas Meter Run	1	SATISFACTORY			
Horizontal Heated Separator	1	SATISFACTORY	Bermed.		

Inspector Name: Waldron, Emily

<b>Facilities:</b>		<input type="checkbox"/> New Tank	Tank ID: _____	
Contents	#	Capacity	Type	SE GPS
	6		STEEL AST	40.644670,-106.394630
S/A/V:	SATISFACTORY		Comment:	
Corrective Action:			Corrective Date:	
<b>Paint</b>				
Condition	Adequate			
Other (Content) _____				
Other (Capacity) _____				
Other (Type) _____				
<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient		Inadequate
Corrective Action	Compact berm in accordance with COGCC rules.			Corrective Date 06/19/2014
Comment	Berm has not been compacted.			
<b>Venting:</b>				
Yes/No	Comment			
<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
<b>Predrill</b>				
Location ID: 426354				
<b>Site Preparation:</b>				
Lease Road Adeq.: _____		Pads: _____	Soil Stockpile: _____	
<b>S/A/V:</b> _____				
Corrective Action: _____		Date: _____	CDP Num.: _____	
<b>Form 2A COAs:</b>				

Group	User	Comment	Date
OGLA	kubeczkod	<p><b>SITE SPECIFIC COAs:</b></p> <p>Location may be a sensitive area due to potentially shallow groundwater; therefore, either a closed loop system must be used (which operator has indicated on the Form 2A), or the drilling pit must be lined and constructed above the top of groundwater.</p> <p>Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals, and maintained in good condition.</p> <p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.</p> <p>The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.</p> <p>If fracing operations occur, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.</p>	08/29/2011

**S/A/V:** ACTION**Comment:**

Berms have not been stabilized. Stormwater BMPs are missing or ineffective.

**CA:** Implement effective stormwater BMPs to comply with COAs.**Date:**

05/30/2014

**Wildlife BMPs:**

BMP Type	Comment
Wildlife	<p>EOG will use a closed loop system during drilling operations for all three locations. The closed loop system will include 1- cuttings pit, and 4-6 400-bbl tanks.</p> <p>If the well is a producing location, EOG will install mufflers on production equipment reducing noise levels in accordance with COGCC Rules and Regulations.</p> <p>In accordance with EOGs Safety Rules and Regulations all company employees must complete a Smith Driving System Training class.</p> <p>EOG company policies prohibit the use or carrying of firearms in company offices and in company vehicles.</p> <p>Interim reclamation will be completed after completion activities or as early as possible to take advantage of available ground moisture.</p> <p>EOG will use a seed mix approved by the authorized officer for all reclamation activities.</p> <p>EOG agrees to conduct drilling and completion activities in accordance with COAs as established by Bureau of Land Management on Indian Creek 1-05H and Peterson Ridge 1-20H.</p>

**S/A/V:****Comment:****CA:****Date:****Stormwater:****Comment:****Staking:**

Inspector Name: Waldron, Emily

**On Site Inspection (305):**

**Surface Owner Contact Information:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Cell Phone: \_\_\_\_\_

**Operator Rep. Contact Information:**

Landman Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Date Onsite Request Received: \_\_\_\_\_

Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

**LGD Contact Information:**

Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Agreed to Attend: \_\_\_\_\_

**Summary of Landowner Issues:**

**Summary of Operator Response to Landowner Issues:**

**Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:**

**Facility**

Facility ID: 426354 Type: WELL API Number: 057-06515 Status: DG Insp. Status: PR

**Producing Well**

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

**Environmental**

**Spills/Releases:**

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

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

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

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

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

**Water Well:**

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

**Field Parameters:**

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

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

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

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

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Inspector Name: Waldron, Emily

Comment: Interim reclamation has not started.

1003a. Debris removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Unused or unneeded equipment onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Pit, cellars, rat holes and other bores closed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors marked? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: \_\_\_\_\_

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

#### RESTORATION AND REVEGETATION

##### Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

##### Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

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

Overall Interim Reclamation \_\_\_\_\_

#### **Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND \_\_\_\_\_

Reminder: \_\_\_\_\_

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

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

Inspector Name: Waldron, Emily

Comment:

Corrective Action:

Date

Overall Final Reclamation

Well Release on Active Location ☐

Multi-Well Location ☐

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Compaction	Fail	Culverts	Fail			
		Ditches	Fail			
Berms	Fail	Compaction	Fail			

S/A/V: **VIOLATION**

Corrective Date: **05/27/2014**

Comment: Run on occurring onto location in several areas. Run off occurring near entrance to pad. Perimeter berm is not compacted and is not complete and continuous in several places. Water is running onto cuttings, not all cuttings are bermed or contained in anyway. In addition to the COGCC rules regarding stormwater management, this location has COAs specific to stormwater management and is in violation of both the COAs and the COGCC rules.

CA: Implement an effective stormwater management plan in accordance with COGCC rules and permit specific COAs.

Pits: ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
Inspector spoke with Andy Ashby of EE3 on 5/20/2014 regarding items discussed in this report. The inspector expects to receive a corrective action plan by 5/27/2014 detailing EE3's plan to return this location to compliance.	waldron	05/20/2014

**Attached Documents**

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

Document Num	Description	URL
673400567	Stormwater erosion	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346441">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346441</a>
673400568	Stormwater, equipment storage, location overview	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346442">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346442</a>
673400569	Missing tank labels	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346443">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346443</a>
673400570	Run on onto cuttings	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346444">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346444</a>
673400571	Stained soil at tank berm	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346445">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346445</a>
673400572	Tubing storage	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346446">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3346446</a>