

**FORM
INSP**

Rev
X/15

**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:

07/12/2017

Submitted Date:

07/14/2017

Document Number:

681700645

FIELD INSPECTION FORM

Loc ID 319937 Inspector Name: Arauza, Steven 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:

OGCC Operator Number: 12400
Name of Operator: BYRON OIL INDUSTRIES INC
Address: 154 CLARKSON EXECUTIVE PARK
City: BALLWIN State: MO Zip: 63011

Findings:

- 29 Number of Comments
- 18 Number of Corrective Actions
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
Axelson, John		john.axelson@state.co.us	
COGCC Engineering		dnr_cogccengineering@state.co.us	
BYRON, RICHARD	636-391-8770	byronoil@aol.com	ALL INSPECTIONS
Leonard, Mike		mike.leonard@state.co.us	
Legler, Paul	970-768-0950	paulleglerpumping@yahoo.com	pumper
Burn, Diana		diana.burn@state.co.us	
Montoya, John		john.montoya@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
104647	PIT	AC			-	Price-Degenhart 1 Skim Pit	EI
114378	PIT	AC			-	Price-Degenhart 1 Production Pit	EI
201942	WELL	PR	12/01/2014	OW	001-07346	PRICE-DEGENHART 1	EI

General Comment:

COGCC Environmental inspection, follow-up to 1/3/2017 and 6/22/2017 Field Inspection Reports (FIRs--documents #685501649 & #681700582).

Twelve (12) out of the nineteen(19) corrective actions (CAs) included in this report are unresolved CAs from previous FIRs. CA dates have passed for eight (8) unresolved CAs. Where CAs required by previous FIRs remain unresolved, respective CA dates remain unchanged.

Location			
Lease Road:			
Type	Access		
comment:	Access/lease road from the south has been repaired. Operator confirmed during 7/13/2017 phone conversation that southern access road is not used for oil and gas operations.		
Corrective ActionL		Date:	
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	Steel panel ASTs still lack NFPA placards and volume labels, as indicated in two previous FIRs. See photos.		
Corrective Action:	Immediately install NFPA placards and volume lables to comply with Rule 210.d.	Date:	02/03/2017
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Adequate.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment around wellhead (pipe, rods, tubing, etc), as indicated in two previous FIRs. See photos.		
Corrective Action:	Immediately remove unused equipment to comply with Rule 603.f using the Rule 603.f guidance document for further details.	Date:	02/03/2017
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Crude Oil	Tank	<= 1 bbl	
Comment:	Historical accumulations of oil-stained soil at tank valves inside and outside of earthen berms, as indicated in previous FIR. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.		Date: 07/26/2017
Lube Oil	Pump Jack	<= 1 bbl	
Comment:	Localized, oil-stained soil beneath prime mover inside of pump jack and shed, as indicated in previous FIR. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.		Date: 07/26/2017
Produced Water	Tank	<= 1 bbl	
Comment:	Puddle of produced water on north side of panel tanks, slow drip was observed on date of inspection. See photos. Informed operator's contractor of leak on inspection date and called operator on 7/13/2017 as a follow-up.		

Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.		Date:	08/14/2017
Other	Tank	<= 1 bbl		
Comment:	Asphaltic soil from historical accumulation of oily waste on south side of unidentified steel panel ASTs. See photos.			
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.		Date:	08/14/2017
Produced Water	WELLHEAD	<= 1 bbl		
Comment:	Small pool of water at wellhead. Possible integrity issue, as indicated in previous FIR. See photos. An audible gas leak was observed on the date of this inspection.			
Corrective Action:	Contact dnr_cogcengineering@state.co.us with resolution plan. Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. Operator needs to prevent any recurring releases at the wellhead.		Date:	07/07/2017

In Containment: No

Comment: Localized, oil-stained soil observed at several locations along west berms of both skim and produced water pit (see photos). These were likely the result of an attempt to remove crude oil from pits in response to 6/22/2017 FIR. Remove and properly dispose of oily waste, per Rule 907.e. by 8/14/2017

Multiple Spills and Releases?

Fencing/:			
Type	PIT		
Comment:	Wire fence around produced water pit.		
Corrective Action:			Date:

Equipment:			corrective date
Type: Ancillary equipment	# 1		
Comment:	Propane tank at pump jack.		
Corrective Action:			Date:
Type: Pump Jack	# 1		
Comment:			
Corrective Action:			Date:
Type: Bird Protectors	# 1		
Comment:			
Corrective Action:			Date:
Type: Deadman # & Marked	# 4		
Comment:			
Corrective Action:			Date:
Type: Ancillary equipment	# 1		
Comment:	Chemical storage tank at pump jack has adequate secondary containment.		
Corrective Action:			Date:
Type: Vertical Heater Treater	# 1		
Comment:			
Corrective Action:			Date:
Type: Flow Line	# 2		
Comment:	NOT IN USE: Two capped, steel 4" flowline risers located east and south of vertical heater treater, as indicated in previous FIR. Risers have not been painted to comply with 2017 Flowline NTO. See photos.		

Corrective Action:	Contact the Engineering Integrity section to discuss flowline abandonment requirements per Rule 1103. Along with the rule, the COGCC Operator Guidance, Rules 1101, 1102, and 1103: Flowline Guidance 1101 and 1102 guidance document can provide further details. Contact dnr_cogccengineering@state.co.us with resolution plan.	Date:	<u>07/07/2017</u>
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Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
CRUDE OIL	1	300 BBLs	STEEL AST			
Comment:	Single crude oil AST inside of berm. Localized, oil-stained soil remains tank valves and access panel, as indicated in previous FIRs. See photos.					
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				Date:	<u>07/26/2017</u>

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Sufficient		Inadequate	
Comment:	Earthen berm is eroded, as indicated in previous FIR. See photos.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date:	<u>07/26/2017</u>

Contents	#	Capacity	Type	Tank ID	SE GPS	
OTHER	2	OTHER	STEEL AST			
Comment:	Unidentified steel panel ASTs west of bermed crude oil tank with historical accumulations of oily beneath valves and seeping from bolts, as indicated in two previous FIRs. See photos. Operator confirmed during 7/13/2017 phone conversation that the tanks are inoperable.					
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. Immediately remove unused equipment (tanks) from this location, pursuant to Rule 603.f. See Rule 603.f guidance document for further details.				Date:	<u>07/07/2017</u>

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
	Inadequate	Walls Insufficient	Base Insufficient	Inadequate	
Comment:	Steel panel ASTs lack any type of secondary containment, as indicated in two previous FIRs. See photos.				
Corrective Action:	Immediately install berms or other secondary containment devices per Rule 605.a.(4).			Date:	<u>02/03/2017</u>

Venting:

Yes/No			
Comment:			
Corrective Action:			Date:

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 104647 Type: PIT API Number: - Status: AC Insp. Status: EI

Facility ID: 114378 Type: PIT API Number: - Status: AC Insp. Status: EI

Facility ID: 201942 Type: WELL API Number: 001-07346 Status: PR Insp. Status: EI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
Tank Bottoms	Tanks	Inadequate	39.831151	-103.857740
Comment	Unused, steel panel tanks NW of crude oil ASTs contain tank bottoms.			
Corrective Action	Properly dispose of any tank bottoms in accordance with 907.f prior to tank disassembly and removal. Provide disposal documentation in accordance with 907.b. (2).			Date: <u>07/31/2017</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: Evidence of sediment transport from produced water pit onto pasture land to west and south of pit.

Corrective Action: Implement stormwater BMPs to prevent erosion, transport of sediment offsite, and site degradation, per Rule 1002.f. Refer to the 1002.f guidance document for further details.

Date: 08/14/2017

Pits: NO SURFACE INDICATION OF PIT

Type: Skimming/Settling Lined: NO Pit ID: 104647 Lat: 39.830810 Long: -103.857291

Reference Point: _____ Other: _____ Length: 25 Width: 25

Lining:

Liner Type: _____ Liner Condition: _____

Comment: Operation of an unlined skim pit is a violation of Rule 904.a.(4). and Rule 323.

Corrective Action: Immediately cease use of skim pit. Submit an eForm 27 Site Investigation and Remediation Workplan to remediate skim pit and either 1) properly permit and line the pit or 2) close skim pit and replace with skim tank.

Date: 07/26/2017c

Fencing:

Fencing Type: None Fencing Condition: _____

Comment: _____

Corrective Action

Date: _____

Netting:

Netting Type: Metal Grid Netting Condition: _____

Comment: Adequate.

Corrective Action

Date: _____

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

Comment: Oil remains on pit and around perimeter, as indicated in previous FIR. Operator had been contacted on 6/22/2017 and instructed to remove oil within 24 hours, per Rule 902.c. Pit berms were showing signs of erosions and weeds were growing inside of berm.

Corrective Action: Immediately remove oil from pit to comply with Rule 902.c and Rule 323. Comply with Rule 603.f using the Rule 603.f guidance document for further details.

Date: 07/07/2017

Type: Produced Water Lined: NO Pit ID: 114378 Lat: 39.830469 Long: -103.857055

Reference Point: _____ Other: _____ Length: 140 Width: 80

Lining:

Liner Type: _____ Liner Condition: _____

Comment: Oil observed covering approximately half of pit surface, as indicated in previous FIR.

Corrective Action: Immediately remove oil from pit to comply with Rules 902.c and Rule 323. Comply with Rule 603.f using the Rule 603.f guidance document for further details.

Date: 07/07/2017c

Fencing:

Fencing Type: Wildlife Fencing Condition: Adequate

Comment: Two dead birds were observed in and around pit. Both were covered in crude oil.

Corrective Action

Date: _____

Netting:		
Netting Type:	Netting Condition:	
Comment:		
Corrective Action		
Anchor Trench Present:	Oil Accumulation: <u>YES</u>	2+ feet Freeboard: <u>NO</u>
Comment:	Pit did not demonstrably contain 2' of freeboard. No method of monitoring and maintaining freeboard was observed during inspection.	
Corrective Action	Install method of monitoring and maintaining at least 2' of freeboard, per Rule 902.b.	
		Date: <u>08/14/2017</u>

Attached Documents

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

Document Num	Description	URL
401342238	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197924
681700647	Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197914