

**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:

08/16/2017

Submitted Date:

08/22/2017

Document Number:

681700809

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:

- 30 Number of Comments
- 20 Number of Corrective Actions
- Corrective Action Response Requested

Contact Information:

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

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 Field Inspection Report (FIR #681700645).

Seventeen (17) out of the twenty (20) corrective actions (CAs) included in this report are unresolved CAs from previous FIRs. CA dates have passed for seventeen (17) unresolved CAs. Where CAs required by previous FIRs remain unresolved, respective CA dates remain unchanged.

Location

Overall Good:

Signs/Marker:

Type	TANK LABELS/PLACARDS		
Comment:	Label and placard are adequate on bermed, crude oil AST only.		
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Steel panel ASTs lack NFPA placards and volume labels, as indicated in three previous FIRs. See photos.		
Corrective Action:	Immediately install NFPA placards and volume labels to comply with Rule 210.d	Date:	02/03/2017
Type	WELLHEAD		
Comment:	Adequate		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment around wellhead (pipe, rods, tubing, etc), as indicated in three 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:

Spills:

Type	Area	Volume			
Crude Oil	Truck Loadout	<= 1 bbl			
Comment:	Localized, oil-stained soil outside of containment on SW side of produced water pit. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date:	09/22/2017
Other	Pump Jack	<= 1 bbl			
Comment:	Localized, oil-stained waste on north side of pump jack and beneath pump jack exhaust. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date:	09/22/2017
Other	Tank	<= 1 bbl			
Comment:	Asphaltic soil from historical accumulation of oily waste on south side of unidentified steel panel ASTs, as indicated in previous FIR. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date:	08/14/2017
Lube Oil	Pump Jack	<= 1 bbl			
Comment:	Localized, oil-stained soil beneath prime mover inside of pump jack shed, 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>
Produced Water	Tank	<= 1 bbl		
Comment:	Puddle of produced water with oily sheen remaining on north side of panel tanks, where drip was observed during FIR #681700645. Drip was not observed on 8/16/2017.			
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>08/14/2017</u>
Crude Oil	Tank	<= 1 bbl		
Comment:	Historical accumulations of oil-stained soil beneath tank valves inside and outside of earthen berms, 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>
Produced Water	WELLHEAD	<= 1 bbl		
Comment:	Small pool of water at wellhead. Possible integrity issue, as indicated in previous FIRs. See photos. Consistant bubbling was observed inside of puddle on date of inspection.			
Corrective Action:	Contact dnr_cogccengineering@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:	<u>07/07/2017</u>

In Containment: No

Comment:

Multiple Spills and Releases?

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

Equipment:				corrective date
Type: Deadman # & Marked	# 4			
Comment:				
Corrective Action:			Date:	
Type: Pump Jack	# 1			
Comment:				
Corrective Action:			Date:	
Type: Ancillary equipment	# 1			
Comment:	Propane tank at pump jack.			
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 FIRs. Risers have not been painted or tagged to comply with 2017 Flowline NTO. See photos. Operator was instructed to contact COGCC engineering unit in previous FIR.			
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>
Type: Bird Protectors	# 1			

Comment:		Date:	
Corrective Action:		Date:	
Type: Vertical Heater Treater	# 1		
Comment:		Date:	
Corrective Action:		Date:	
Type: Ancillary equipment	# 1		
Comment:	Chemical storage drum at pump jack has adequate secondary containment.	Date:	
Corrective Action:		Date:	

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 beneath south tank valve and puddle of water observed beneath 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: 07/26/2017

Paint

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

Berms

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

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: 07/07/2017

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 previous FIRs. See photos.	
Corrective Action:	Immediately install berms or other secondary containment devices per Rule 605.a.(4).	Date: 02/03/2017

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)		
Used Oil	Other	Inadequate			
Comment	Bucket of oily waste observed on west side of prime mover (inside of shed). See photos.				
Corrective Action	Remove and properly dispose of oily waste, per Rule 907.e				Date: <u>09/22/2017</u>
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, as indicated in previous FIRs. See photos.

Corrective Action: Immediately 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: Inadequate

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

Corrective Action

Operator was instructed to immediately cease operation of skim pit and submit eForm 27 for site closure in previous FIR and by phone. Skim pit remained in operation on inspection date. 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: _____ Fencing Condition: _____

Comment: _____

Corrective Action

Date: _____

Netting:

Netting Type: Metal Grid Netting Condition: Sagging into pit contents

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 FIRs, although operator had managed to remove some. 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: _____ Width: _____

Lining:

Liner Type: _____ Liner Condition: _____

Comment: Oil remains covering approximately 5-10% of pit surface.

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: Corrective Action		Date:
Netting: Netting Type:	Netting Condition:	
Comment: Corrective Action		Date:
Anchor Trench Present: Oil Accumulation: <u>YES</u> 2+ feet Freeboard: <u>YES</u>		
Comment: Corrective Action	Pit did not demonstrably contain 2' of freeboard. No method of monitoring and maintaining freeboard was observed during inspection. Operator was instructed to install freeboard monitoring method in previous FIR. Immediately 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
681700816	Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4234401