

**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:

08/28/2017

Document Number:

681700808**FIELD INSPECTION FORM**
 Loc ID 316923 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 94300Name of Operator: WARD & SON\* ALFREDAddress: P O BOX 737City: OGALLALLA State: NE Zip: 69153**Status Summary:**

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

**Findings:**46 Number of Comments27 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
,		dnr_cogccengineering@state.co.us	
Young, Rob		rob.young@state.co.us	
Leonard, Mike		mike.leonard@state.co.us	
Ward, Randy	308-284-8350	rlwardne@charter.net	
Axelson, John		john.axelson@state.co.us	
Ward, Randy		randy@wardoil.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
107645	PIT	CL			-	STATE 58-630	EI
107647	PIT	AC			-	STATE 58-630	EI
107648	PIT	AC			-	STATE 58-630	EI
117577	PIT	AC			-	STATE 1	EI
233234	WELL	SI	04/01/2017	OW	121-05261	STATE 1	EI
440212	PIT				-	State 1 Historic Pit 440212	EI

**General Comment:**

COGCC Environmental Inspection of wellhead, tank battery, and pit complex. Follow-up to Remediation Project #8068.

**Location**Overall Good: ☒

<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	Emergency contact number missing from well sign. See photos.		
Corrective Action:	Install sign to comply with Rule 210.b.	Date:	09/28/2017
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	NFPA Placards and/or labels missing from horizontal AST/FWKO north of VHT, produced water frac tank, and produced water PBV located NW of crude oil ASTs. See photos.		
Corrective Action:	Install placards and labels to comply with Rule 210.d.	Date:	10/28/2017

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	DEBRIS		
Comment:	NE corner of pit #107647 contains concrete debris. See photos.		
Corrective Action:	Comply with Rule 603.f .	Date:	11/28/2017
Type	WEEDS		
Comment:	Uncontrolled weeds growing inside of all pit berms. See photos.		
Corrective Action:	Comply with Rule 603.f	Date:	09/07/2017
Type	TRASH		
Comment:	Trash and junk equipment (barbed wire, fence post, tire, concrete debris, junk pipe and polyline) located west of pit complex and at NW corner of pit #107645. See photos.		
Corrective Action:	Comply with Rule 603.f	Date:	09/07/2017
Type	OTHER		
Comment:	Unidentified, vegetated soil stockpile measuring ~180'x30'x10' east of crude oil ASTs. See photos.		
Corrective Action:	Contact COGCC EPS to discuss stockpile contents and corrective actions.	Date:	09/07/2017

Overall Good: ☐

<b>Spills:</b>			
Type	Area	Volume	
Crude Oil	Tank	<= 1 bbl	
Comment:	Localized historical accumulations of oily waste beneath valves on west side of crude oil ASTs and at truck loadout. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.		Date: 09/28/2017
Crude Oil	Treater	<= 1 bbl	
Comment:	Localized, oil-stained soil inside of FWKO shed. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e		Date: 09/28/2017
Crude Oil	Tank	<= 1 bbl	

Comment:	Localized, oil-stained soil inside of shed attached to southern produced water AST. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e			Date:	09/28/2017
Crude Oil	Treater	<= 1 bbl			
Comment:	Localized, oil-stained soil inside of treater shed. Oily rag just north of treater shed. See photos.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e			Date:	09/28/2017
Crude Oil	Pump Jack	<= 1 bbl			
Comment:	Localized accumulations of oily waste on top of former pump jack foundation.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e			Date:	09/28/2017

In Containment: No

Comment:

☒ Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	WELLHEAD		
Comment:	Panel fence at wellhead.		
Corrective Action:			Date:

<b>Equipment:</b>			corrective date
Type: Ancillary equipment	# 1		
Comment:	Day tank with secondary containment device south of wellhead. Secondary containment device is partially full of contaminated stormwater.		
Corrective Action:	Remove and properly dispose of contaminated storm water as part of routine maintenance.		
Date:	09/28/2017		
Type: Flow Line	# 1		
Comment:	NOT IN USE: Uncapped, 2" flowline valve daylights on north side of crude oil ASTs. 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:	09/07/2017		
Type: Bird Protectors	# 1		
Comment:	at VHT		
Corrective Action:			Date:
Type: Flow Line	# 1		
Comment:	Flowline manifold with risers located south of FWKO shed. See photos.		
Corrective Action:			Date:
Type: Ancillary equipment	# 1		
Comment:	55-gallon drum/day tank south of FWKO shed lacks secondary containment device but is located within shared earthen berm. See photos.		
Corrective Action:			Date:
Type: Flow Line	# 1		
Comment:	NOT IN USE: Uncapped, steel, 4" flowline riser with 90-degree bend located south of flowline riser. 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:	09/07/2017
Type: Ancillary equipment	# 1			
Comment:	Propane tank south of tank battery.			
Corrective Action:			Date:	
Type: Flow Line	# 2			
Comment:	NOT IN USE: Two (2) steel, 2" flowline risers inside of VHT shed (one plugged, one with uncapped 1" valve). 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:	09/07/2017
Type: Ancillary equipment	# 1			
Comment:	Cement foundation for pumping unit remains at wellhead.			
Corrective Action:			Date:	
Type: Vertical Heater Treater	# 1			
Comment:	Shared earthen berm and bird protection.			
Corrective Action:			Date:	

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	1		STEEL AST		39.742597,-103.368693
Comment:	Unlabeled horizontal AST/FWKO at treater shed. See Signs/Marker section for corrective action.				
Corrective Action:				Date:	

**Paint**

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

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:	Shared earthen berm with crude oil ASTs. See Berm section for crude oil ASTs for corrective action.			
Corrective Action:			Date:	

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1		OTHER		
Comment:	Produced water frac tank north of 300-bbl produced water ASTs. See photos. See Signs/Marker section for corrective action.				
Corrective Action:			Date:		

**Paint**

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:	Berms shared with produced water ASTs and western pit. See produced water ASTs for corrective actions.				
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	400 BBLs	STEEL AST		39.742669,-103.368714
Comment:	Steel produced water AST south of crude oil ASTs.				
Corrective Action:				Date:	

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate			Inadequate	
Comment:	Earthen berm, shared with crude oil ASTs and separator sheds, is shallow.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date: 09/28/2017	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1		PBV FIBERGLASS		,
Comment:	Produced water PBV located north of frac tank. No volume label. See Signs/Marker section for corrective action. See photos.				
Corrective Action:				Date:	

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:	Berms shared with produced water ASTs and western pit. See produced water ASTs for corrective actions.				
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	2	300 BBLs	STEEL AST		39.742877,-103.369031
Comment:	NFPA Placards and labels on produced water ASTs are faded and illegible from a distance. See photos.				

Corrective Action:	Repair placards and labels to comply with Rule 203.d	Date:	10/28/2017
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Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate			Inadequate
Comment: Earthen berms shared between produced water ASTs, fiberglass PBV, and frac tank are shallow, eroded, and contain weeds. Berms are located on north, east, and south sides of tanks. No berm exists on west side, which is shared with pit.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date: 09/28/2017

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	300 BBLs	STEEL AST		39.742647,-103.368704
Comment: See Spills section for corrective actions related to historical accumulations of oily waste.					
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate			Inadequate
Comment: Earthen berm, shared with 400 bbl produced water AST and separator sheds, is shallow.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date: 09/28/2017

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>107645</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>CL</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>107647</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>107648</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>117577</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>233234</u>	Type:	<u>WELL</u>	API Number:	<u>121-05261</u>	Status:	<u>SI</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>440212</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u></u>	Insp. Status:	<u>EI</u>

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)	
Used Oil	Other	Inadequate	39.742659	-103.368719
Comment:	Open-top buckets of oily waste stored inside of shed attached to southern produced water AST and inside of treater shed. See photos.			
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e.			Date: 09/28/2017

**Spill/Remediation:**

Comment:	Remediation Project #8068 indicates that operator shall provide annual land treatment progress report. No approved land treatment Form 27 is on file for the subject location. Operator had been instructed repeatedly to collect a minimum of five (5) confirmation samples for pit closure and to submit complete laboratory reports to COGCC. Full laboratory reports have not been provided. Based on partial reports and supplemental eForm 27, it appears that only 2-3 confirmation samples have been analyzed. Operator's supplemental 27 was conditionally approved with instructions to excavate additional material.		
Corrective Action:	Immediately contact COGCC EPS to discuss remediation project, land treatment, and waste disposal requirements.		Date: 09/07/2017

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: Produced Water      Lined: NO      Pit ID: 107648      Lat: 39.743465      Long: -103.368690

Reference Point:       Other:       Length: 180      Width: 75

**Lining:**

Liner Type:       Liner Condition:

Comment: Corrective Action: Date: c**Fencing:**

Fencing Type: None      Fencing Condition:

Comment: Corrective Action: Date: **Netting:**

Netting Type:       Netting Condition:

Comment: Corrective Action: Date: 

Anchor Trench Present:       Oil Accumulation: NO      2+ feet Freeboard: YES

Comment: Localized, oil-stained soil at NW corner of berm. Uncontrolled weeds growing in berm. Junk pipe on east berm. See photos. Berm is eroded, freeboard OK.

Corrective Action: 

Remove and properly dispose of oily waste, per Rule 907.e

Date: 09/28/2017

Type: Produced Water      Lined: NO      Pit ID: 117577      Lat: 39.743726      Long: -103.368714

Reference Point:       Other:       Length: 180      Width: 75

**Lining:**

Liner Type:       Liner Condition:

Comment: Corrective Action: Date: c**Fencing:**

Fencing Type: None      Fencing Condition:

Comment: Corrective Action: Date: **Netting:**

Netting Type:       Netting Condition:

Comment:					Date:
Corrective Action					
Anchor Trench Present:	Oil Accumulation: <u>NO</u>	2+ feet Freeboard: <u>YES</u>			
Comment:	Localized, oil-stained soil at NW corner of pit. See photos. Berm is eroded, freeboard OK.				
Corrective Action	Remove and properly dispose of oily waste, per Rule 907.e				Date: <u>09/28/2017</u>
Type: <u>Produced Water</u>	Lined: <u>NO</u>	Pit ID: <u>107647</u>	Lat: <u>39.742872</u>	Long: <u>-103.369277</u>	
Reference Point:	Other:	Length: <u>150</u>	Width: <u>100</u>		
<u>Lining:</u>					
Liner Type:	Liner Condition:				
Comment:					
Corrective Action					Date: <u>c</u>
<u>Fencing:</u>					
Fencing Type: <u>None</u>	Fencing Condition:				
Comment:					
Corrective Action					Date:
<u>Netting:</u>					
Netting Type:	Netting Condition:				
Comment:					
Corrective Action					Date:
Anchor Trench Present:	Oil Accumulation: <u>NO</u>	2+ feet Freeboard: <u>YES</u>			
Comment:	Produced water pit shares east berm with produced water tank battery. NE corner of pit contains concrete debris (see photos). Uncontrolled weeds growing inside of berms. Evidence of erosion and transport of material offsite to west and east of pit.				
Corrective Action	Install required stormwater BMPs to prevent offsite sediment transport per Rule 1002.f.				Date: <u>09/28/2017</u>
Type: <u>Produced Water</u>	Lined: <u>NO</u>	Pit ID: <u>440212</u>	Lat: <u>39.742182</u>	Long: <u>-103.368536</u>	
Reference Point:	Other:	Length: <u>90</u>	Width: <u>75</u>		
<u>Lining:</u>					
Liner Type:	Liner Condition:				
Comment:	Localized, oil-stained soil on northern berm of south pit. See photos.				
Corrective Action	Remove and properly dispose of oily waste, per Rule 907.e				Date: <u>09/28/2017c</u>
<u>Fencing:</u>					
Fencing Type: <u>None</u>	Fencing Condition:				
Comment:					
Corrective Action					Date:
<u>Netting:</u>					
Netting Type:	Netting Condition:				
Comment:					
Corrective Action					Date:

Anchor Trench Present: <u>NO</u>		Oil Accumulation: <u>NO</u>		2+ feet Freeboard: <u>YES</u>	
Comment:		Historical pit located ~180' SE of VHT shed. Operator was instructed in December 2014 email (doc #2313356) to submit Form 27 for pit closure. No form 27 has been received.			
Corrective Action		Immediately submit eForm 27 workplan for pit closure, per Rule 905. Workplan is subject to prior approval by COGCC EPS before work can commence.			
Type: <u>Skimming/Settling</u>		Lined: <u>NO</u>	Pit ID: <u>107645</u>	Lat: <u>39.743143</u>	Long: <u>-103.368892</u>
Reference Point: _____		Other: _____		Length: <u>75</u>	Width: <u>60</u>
<b>Lining:</b>					
Liner Type:		Liner Condition:			
Comment:		Excavation related to skim pit closure under remediation project #8068 remains open...			
Corrective Action		Date: <u>c</u>			
<b>Fencing:</b>					
Fencing Type: <u>Other</u>		Fencing Condition: <u>Inadequate</u>			
Comment:		Partial barbed-wire fence in need of repair.			
Corrective Action		Repair fence during routine maintenance.			
Date: <u>09/28/2017</u>					
<b>Netting:</b>					
Netting Type:		Netting Condition:			
Comment:					
Corrective Action		Date:			
Anchor Trench Present:		Oil Accumulation: <u>NO</u>		2+ feet Freeboard: <u>YES</u>	
Comment:		Uncontrolled weeds growing in and around excavation walls. Junk pipe located at NW corner of excavation. See Housekeeping section for corrective actions.			
Corrective Action		Date:			

**Attached Documents**

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

Document Num	Description	URL
401389281	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238972">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238972</a>
681700817	Field Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238962">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238962</a>
681700818	Supplemental Remediation Report	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238963">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238963</a>
681700819	Remediation Conditions of Approval	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238964">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238964</a>
681700820	Pit closure email	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238965">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4238965</a>