

**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:

08/30/2017

Submitted Date:

09/05/2017

Document Number:

681700823**FIELD INSPECTION FORM**Loc ID 312283 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 7810Name of Operator: BERENERGY CORPAddress: 1888 SHERMAN ST - SUITE 600City: DENVER State: CO Zip: 80203**Status Summary:**

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

Findings:20 Number of Comments13 Number of Corrective Actions

- ☒ Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
		dnr_cogccenforcement@state.co.us	
Hall, Dan		dan@energyop.com	
Trujillo, Aaron		aaron.trujillo@state.co.us	
Hall, Dan		david@energyop.com	
Young, Rob		rob.young@state.co.us	
Axelson, John		john.axelson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
220968	WELL	PA	07/05/2016	OW	075-09094	MERINO 1	EI

General Comment:

COGCC Environmental inspection. Follow-up to Remediation Project #10204. Operator's approved remediation completion date of 6/15/2017 is used as the corrective action date for issues related to Remediation Project #10204.

Well was plugged on 7/5/2016, per Form 6 Subsequent Report of Abandonment (doc #2225188). Well is out of compliance with Rule 1004 Final Reclamation requirements to remove flowlines, surface equipment and debris within twelve months of PA. As a result, the corrective action date of 7/5/2017 is used for Rule 1004 compliance issues documented in this report. This facility is being referred to COGCC are Reclamation Specialist Aaron Trujillo for surface reclamation violations.

LocationOverall Good: ☐

Signs/Marker:			
Type	BATTERY		
Comment:	Adequate		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Adequate.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Adequate.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	Sheet metal from former separator shed, tank stairs, fence posts, and truck loadout secondary containment device remain north and east of produced water pit (see photos). Per Rule 1004 Final Reclamation requirements, all debris and surface equipment should have been removed within twelve months of plugging the well.		
Corrective Action:	Immediately remove surface equipment and debris to facilitate surface reclamation.	Date:	07/05/2017
Type	UNUSED EQUIPMENT		
Comment:	Pump jack, prime mover, and shed remain at well pad. Unused vertical heated separator and two crude oil ASTs remain at production facility. Per Rule 1004 Final Reclamation requirements, all debris and surface equipment should have been removed within twelve months of plugging the well.		
Corrective Action:	Immediately remove surface equipment and debris to facilitate surface reclamation.	Date:	07/05/2017

Overall Good: ☐

Spills:			
Type	Area	Volume	
Lube Oil	Pump Jack	<= 1 bbl	
Comment:	Lube-oil saturated soil inside of pump jack shed.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e		Date: 10/05/2017

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Pump Jack	# 1		
Comment:	Disassembled pump jack remains on location.		
Corrective Action:		Date:	
Type: Flow Line	# 3		

Comment:	NOT IN USE: 2" plugged, steel flowline riser and additional 4" riser NW of tinhorn (see photos). Unplugged 2" steel riser immediately north of tinhorn. Per Rule 1004 Final Reclamation Requirements, flowline risers should have been removed within twelve months of plugging the well.		
Corrective Action:	Immediately 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:	07/05/2017
Type: Vertical Heater Treater	# 1		
Comment:	VHT remains on-site.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	300 BBLs	STEEL AST		
Comment:	Localized, oil-stained soil remains underlying crude oil ASTs (see photos).				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e				Date: 10/05/2017

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:	Tanks are empty, but earthen berms have been removed and stockpiled at former tank battery. See Environmental section for corrective actions.			
Corrective Action:			Date:	

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Tank Bottoms	Tanks	Inadequate		
Comment	Tanks likely to contain tank bottoms.			
Corrective Action	Remove and properly dispose of tank bottoms, per Rule 907.f.			Date: 10/05/2017
Oily Soil	Piles	Inadequate		
Comment	Former earthen berms have been scraped and stockpiled at SW corner and east side of crude oil ASTs.			
Corrective Action	Properly treat or dispose of oily waste in accordance with Rule 907.e. Contact area COGCC EPS Rob Young to discuss disposal requirements.			Date: 09/15/2017

Spill/Remediation:

Comment: Form 27 for pit closure was approved with a remediation completion date of 6/15/2017 and a reclamation completion date of 7/31/2017. As of inspection date for this report (8/30/2017), there were no indications that work had commenced under the approved workplan. No updates have been provided by operator.

Corrective Action: Immediately contact Area EPS, Rob Young, to provide update on remediation project status. Date: 06/15/2017

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 PITType: Skimming/SettlingLined: NOPit ID: Lat: Long: Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition: Comment: Corrective Action: Date: c**Fencing:**Fencing Type: LivestockFencing Condition: InadequateComment: Barbed wire fence, shared with produced water pit, in need of repair.Corrective Action: Date: 10/05/2017**Netting:**Netting Type: MeshNetting Condition: GapsComment: Wildlife mesh is damaged. See photos.Corrective Action: Date: 10/05/2017Anchor Trench Present: Oil Accumulation: YES2+ feet Freeboard: Comment: Oil skim tinhorn remains open. Produced fluids present inside tinhorn. See photos.Corrective Action: Date: 06/15/2017Type: Produced WaterLined: NOPit ID: 110650Lat: 40.455538Long: -103.456683Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition: Comment: Corrective Action: Date: c**Fencing:**Fencing Type: LivestockFencing Condition: Comment: Barbed wire fence in need of repair.Corrective Action: Date: 10/05/2017**Netting:**Netting Type: Netting Condition:

Comment:		Date:
Corrective Action		
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:
Comment:	Produced water pit remains open. Oil-stained soil is present in NE, SW, and SE corners. See photos.	
Corrective Action	Immediately remove and properly dispose of oily waste, per Rule 907.e. Analyze confirmation samples for pit closure and submit analytical results to COGCC, per Remediation project #10204.	
		Date: <u>06/15/2017</u>

Attached Documents

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

Document Num	Description	URL
401395381	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4244192
681700861	Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4244186