

**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:

11/28/2017

Submitted Date:

12/04/2017

Document Number:

681700954**FIELD INSPECTION FORM**Loc ID 331795 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10112Name of Operator: FOUNDATION ENERGY MANAGEMENT LLCAddress: 5057 KELLER SPRINGS RD STE 650City: ADDISON State: TX Zip: 75001**Status Summary:**

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

Findings:34 Number of Comments28 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
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Allison, Rick		rick.allison@state.co.us	
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,		regulatory@foundationenergy.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
266038	WELL	SI	04/01/2016	OW	123-21315	WICKSTROM 6-5	SI
331795	LOCATION	AC	04/01/2016		-	WICKSTROM-67N59W 6SWNW	AC

General Comment:

COGCC Environmental inspection of well and production facility. Follow-up to Field Inspection Reports (FIRs) #681700927 & #678800393, as well as Remediation Project #1834.

Of the twenty-eight (28) corrective actions included in this report, twenty-four (24) remain unresolved from previous field inspection reports. Where corrective actions from previous inspection reports remain unresolved, original corrective action dates remain.

Location				
Overall Good: <input type="checkbox"/>				
Signs/Marker:				
Type	TANK LABELS/PLACARDS			
Comment:	NFPA placard on skim tank is adequate but skim tank lacks volume label. Operator still has time to address this issue, per CA date listed on previous FIR.			
Corrective Action:	Install sign on skim tank to comply with Rule 210.d.			Date: 12/26/2017
Type	BATTERY			
Comment:	Sign at tank battery only lists Wickstrom 6-12, which was incapable of production on date of inspection, and emergency contact number for operator is partially obscured. Signs for Wickstrom 6-4 & 6-5 are attached to separator/treater sheds. This corrective action remains unresolved from previous FIR. See photos.			
Corrective Action:	Install well signs at tank battery to comply with Rule 210.b.			Date: 11/26/2017
Type	WELLHEAD			
Comment:	No sign at wellhead. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Install well sign to comply with Rule 210.b.			Date: 11/26/2017
Emergency Contact Number:				
Comment:	<input type="text"/>			
Corrective Action:	<input type="text"/>			Date: <input type="text"/>
Good Housekeeping:				
Type	STORAGE OF SUPL			
Comment:	Rusty 55-gallon drum full of fluid east of 300 bbl crude oil ASTs. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Comply with Rule 603.f (55-gallon drum).			Date: 11/26/2017
Type	UNUSED EQUIPMENT			
Comment:	Southernmost horizontal heater treater surrounded by debris/remains of former shed does not appear to be in use, neither does pump jack. See photos. Operator still has time to address this issue, per CA date listed on previous FIR.			
Corrective Action:	Comply with Rule 603.f (horizontal heater treater and pump jack).			Date: 01/26/2018
Type	UNUSED EQUIPMENT			
Comment:	NOT IN USE: Three (3) bullplugged, 2" steel flowline risers located: south of NW crude oil AST (1), east of 300-bbl crude oil ASTs (2). Operator was instructed to contact Engineering unit to discuss flowline abandonment requirements in previous FIR.			
Corrective Action:	Comply with Rule 603.f (unused flowline risers).			Date: 01/04/2018
Type	DEBRIS			
Comment:	Accumulation of junk, debris, and wind-blown weeds beneath pump jack. Junk and debris at former treater shed south of two existing sheds. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Comply with Rule 603.f (debris).			Date: 11/05/2017
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath production tank loadline, as indicated in 8/28/2017 Field Inspection Report. See photos. This corrective action remains unresolved from previous FIRs.			
Corrective Action:	Immediately remove and properly dispose of oily waste beneath production tank loadline, per Rule 907.e			Date: 08/29/2017

Crude Oil	Flow Line	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath southern 2" flowline riser on east side of 400-bbl crude oil ASTs. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Remove and properly dispose of oily waste beneath flowline riser east of crude oil ASTs, per Rule 907.e.			Date: 10/28/2017
Crude Oil	WELLHEAD	<= 1 bbl		
Comment:	Historical accumulation of localized, oil-stained soil beneath wellhead, flowline riser, and day tank immediately south of wellhead. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Remove and properly dispose of oily waste associated with wellhead, per Rule 907.e.			Date: 10/28/2017
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath valves on north and south sides of 300-bbl and 400-bbl crude oil ASTs. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Remove and properly dispose of oily waste beneath tank valves, per Rule 907.e.			Date: 10/28/2017
Condensate	Separator	<= 1 bbl		
Comment:	Localized, oil-stained soil beneath gas meter inside of Wickstrom #6-4 separator shed. See photos.			
Corrective Action:	Remove and properly dispose of oily waste beneath gas meter, per Rule 907.e.			Date: 12/06/2017
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil and oily-weeds at skim tank outlet. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Remove and properly dispose of oily waste at skim tank outlet, per Rule 907.e.			Date: 10/28/2017
Crude Oil	Separator	<= 1 bbl		
Comment:	Historical accumulations of oil-stained soil (and hydrocarbon odor) inside of Wickstrom #6-5 treater shed. See photos. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Remove and properly dispose of oily waste inside of Wickstrom #6-5 treater shed, per Rule 907.e.			Date: 10/28/2017

In Containment: No

Comment:

☒ Multiple Spills and Releases?

Equipment:			corrective date
Type: Flow Line	# 8		
Comment:	Historical accumulation of oily waste beneath flowline riser south of wellhead and flowline risers east of 400-bbl crude oil ASTs. See photos. This corrective action remains unresolved from previous FIR.		
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 (flowlines).		Date: 11/26/2017
Type: Vertical Heater Treater	# 2		
Comment:	Treater conditions inside of Wickstrom #6-4 shed are satisfactory. Historical accumulations of oily waste inside of Wickstrom #6-5 shed. See photos. This corrective action remains unresolved from previous FIR.		
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 (vertical heater treater).		Date: 11/26/2017
Type: Flare	# 1		
Comment:	Gas flare south of skim tank and produced water pit is plumbed to 1" and 2" flowline risers. See photos.		
Corrective Action:			Date:
Type: Ancillary equipment	# 1		

Comment:	Day tank at southeast corner of pump jack lacks secondary containment device. See photos. This corrective action remains unresolved from previous FIR.		Date:	11/26/2017
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 906.d.(1) (day tank).			
Type: Vertical Separator	# 2			
Comment:	Separator conditions inside of Wickstrom #6-4 shed are satisfactory. Historical accumulations of oily waste inside of Wickstrom #6-5 shed. See photos. This corrective action remains unresolved from previous FIR.		Date:	11/26/2017
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 (vertical separator).			
Type: Gas Meter Run	# 2			
Comment:	Localized, oil-stained soil beneath gas meter run inside of Wickstrom #6-4 separator shed.		Date:	01/04/2018
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 (gas meter).			

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	OTHER	PBV FIBERGLASS		
Comment:	Skim tank outlet to evaporation pit is disassembled. Localized, oil-stained soil beneath disassembled outlet. See photos. This corrective action remains unresolved from previous FIR.				
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 (skim tank).				Date: 11/26/2017

Paint

Condition	
Other (Content)	
Other (Capacity)	No volume label (see Signs/Marker section)
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Inadequate	Walls Insufficient		Adequate	
Comment:	Earthen berm shared with produced water pit. Skim tank lacks earthen berms on north, west, and south sides. See photos. This corrective action remains unresolved from previous FIR.				
Corrective Action:	Install berms or other secondary containment devices per Rule 605.a.(4) (skim tank).			Date: 11/26/2017	
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	400 BBLs	STEEL AST		
Comment:	Localized, historical accumulations of oily waste beneath valves on north and south sides of tanks. See photos. This corrective action remains unresolved from previous FIR.				
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 (400 bbl crude oil ASTs).				Date: 11/26/2017

Paint

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

Berms					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Insufficient		Inadequate	
Comment: Earthen berms shared by 300-bbl and 400-bbl crude oil ASTs are eroded and shallow. See photos. This corrective action remains unresolved from previous FIR.					
Corrective Action: Repair or install berms or other secondary containment devices per Rule 605.a.(4) (crude oil ASTs).					Date: 11/26/2017
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	4	300 BBLS	STEEL AST		,
Comment: Localized, historical accumulations of oil-stained soil beneath valves on north and south sides of tanks. West tank does not appear to be in use, based on bullplugged valve and flowline riser on south side of tank. See photos. This corrective action remains unresolved from previous FIR.					
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 (300 bbl crude oil ASTs)					Date: 11/26/2017

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Insufficient		Inadequate	
Comment: Earthen berms shared by 300-bbl and 400-bbl crude oil ASTs are eroded and shallow. See photos. This corrective action remains unresolved from previous FIR.					
Corrective Action: Repair or install berms or other secondary containment devices per Rule 605.a.(4) (crude oil ASTs).					Date: 11/26/2017

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	Field Flare	
Comment:	Inactive gas flare plumbed to active flowlines SW of produced water pit. See photos. Operator was instructed in previous FIR to contact COGCC engineering unit to discuss flaring requirements under Rule 912 by 11/9/2017.	
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>266038</u>	Type:	<u>WELL</u>	API Number:	<u>123-21315</u>	Status:	<u>SI</u>	Insp. Status:	<u>SI</u>
Facility ID:	<u>331795</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>AC</u>

Environmental**Spill/Remediation:**

Comment: Previous operator had approval to burn and stockpile oily waste under Remediation Project #1834 with the condition that a sample be collected from base of pit, per corrective actions proscribed by NOAV #1126686. Remediation project remains active, confirmation samples and disposal manifests were never submitted to COGCC. Operator contacted COGCC on 10/27/2017 to briefly discuss active remediation project.

Corrective Action: Remit records of work performed under Remediation Project #1834 or contact EPS Steven Arauza to discuss closure requirements.

Date: 12/15/2017

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: Produced WaterLined: NOPit ID: 273445Lat: 40.611286Long: -104.025510Reference Point: Other: Length: 30Width: 25**Lining:**Liner Type: Liner Condition: Comment: No liner.Corrective Action: Date: c**Fencing:**Fencing Type: Fencing Condition: Comment: No fence.Corrective Action: Date: **Netting:**Netting Type: MeshNetting Condition: Comment: Gaps in mesh around perimeter of pit are large enough to allow wildlife access, as indicated in previous Field Inspection Reports. See photos.Corrective Action: Date: 09/03/2017Anchor Trench Present: NOOil Accumulation: YES2+ feet Freeboard: YESComment: Oil-stained soil on pit berm underlying inlet from skim tank. See photos. This corrective action remains unresolved from previous FIR.Corrective Action: Date: 10/28/2017**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/webblink/>) and search by document number:

Document Num	Description	URL
681700959	Field photos	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4316045