

**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:

681700958**FIELD INSPECTION FORM**Loc ID 331062 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:**32 Number of Comments24 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
,		dnr_cogccenforcement@state.co.us	
,		regulatory@foundationenergy.com	<a href="#">All Inspections</a>
Leonard, Mike		mike.leonard@state.co.us	
Allison, Rick		rick.allison@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
258177	WELL	PR	11/01/2000	GW	123-20097	HOFFMAN 34-10	EI

**General Comment:**

COGCC environmental inspection of well, pit complex, and production facility. Follow-up to Remediation Projects #1836 &amp; #9287, and Field Inspection Reports #684904469 &amp; #681700932.

Out of twenty four (24) corrective actions included in this report, twenty one (21) remain unresolved from previous FIRs. Where corrective actions from previous field inspection reports remain unresolved, original corrective action dates remain unchanged.

Location				
Overall Good: <input type="checkbox"/>				
<b>Signs/Marker:</b>				
Type	WELLHEAD			
Comment:	No sign at wellhead. This corrective action remains unresolved from previous FIR.			
Corrective Action:	Install sign to comply with Rule 210.b.			Date: 11/24/2017
Emergency Contact Number:				
Comment:				
Corrective Action:				Date: _____
<b>Good Housekeeping:</b>				
Type	WEEDS			
Comment:	Accumulation of wind-blown weeds at pump jack and wellhead. Uncontrolled weeds growing inside/along both produced water pits, as indicated in previous Field Inspection Reports. See photos.			
Corrective Action:	Comply with Rule 603.f.			Date: 10/06/2017
Type	UNUSED EQUIPMENT			
Comment:	NOT IN USE: Uncapped, steel 2" flowline riser west of northern crude oil AST. Two 2" steel flowline risers (one bullplugged, one uncapped) at SE corner of crude oil AST berms. Uncapped 2" steel riser north of produced water pit, marked by T-post, as indicated on previous FIR. See photos.			
Corrective Action:	Comply with Rule 603.f. (flowlines)			Date: 03/04/2018
Overall Good: <input type="checkbox"/>				
<b>Spills:</b>				
Type	Area	Volume		
Lube Oil	Pump Jack	<= 1 bbl		
Comment:	Localized accumulation of oil-stained soil beneath pump jack, as indicated in previous Field Inspection Reports. See photos.			
Corrective Action:	Remove and properly dispose of non-E&P waste in accordance with Rule 907A. (pump jack)			Date: 09/28/2017
Crude Oil	Tank	<= 1 bbl		
Comment:	Localized, oil-stained soil underlying crude oil AST valves. See photos. This corrective action remains unresolved from previous FIRs.			
Corrective Action:	Remove and properly dispose of oily waste in accordance with Rule 907.e. (crude oil ASTs)			Date: 10/26/2017
Crude Oil	Separator	<= 1 bbl		
Comment:	Localized, oil-stained soil and historical accumulations of oily waste inside of separator shed. See photos. This corrective action remains unresolved from previous FIRs.			
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (separator shed)			Date: 10/26/2017
Other	Pump Jack	<= 1 bbl		
Comment:	Localized accumulations of oil-stained soil beneath day tank at SW corner of pump jack. See photos. This corrective action remains unresolved from previous FIRs.			
Corrective Action:	Remove and properly dispose of non-E&P waste in accordance with Rule 907A. (day tank)			Date: 10/26/2017
Lube Oil	Pump Jack	<= 1 bbl		
Comment:	Localized accumulations of oil-stained soil beneath prime mover and exhaust. See photos. This corrective action remains unresolved from previous FIRs.			
Corrective Action:	Remove and properly dispose of non-E&P waste in accordance with Rule 907A. (prime mover)			Date: 10/26/2017

Crude Oil	Tank	<= 1 bbl			
Comment:	Oily rag and small pile of oil-stained soil at skim tank. See photos. This corrective action remains unresolved from previous FIRs.				
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (skim tank)			Date: 10/26/2017	
In Containment: No					
Comment: <input type="text"/>					
<input checked="" type="checkbox"/> Multiple Spills and Releases?					
<b>Equipment:</b>				corrective date	
Type: Ancillary equipment	# 2				
Comment:	Two day tanks located at SW and SE corners of pump jack. 55-gallon drum used as day tank at SW corner of pump jack lacks secondary containment. See photos. This corrective action remains unresolved from previous FIR.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 906.d.(1). (day tanks)			Date: 11/24/2017	
Type: Pump Jack	# 1				
Comment:	Lube oil staining on either side of pump jack equipment and stained soil underlying pump jack, as documented on previous Field Inspection Report.				
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. (pump jack)			Date: 11/24/2017	
Type: Other	# 1				
Comment:	Fresh crude oil stains observed on wellhead equipment. 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. (wellhead)			Date: 11/24/2017	
Type: Prime Mover	# 1				
Comment:	Historical accumulations of oil-stained soil beneath prime mover. Operator was instructed to ensure integrity in previous Field Inspection Reports. See photos.				
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. (prime mover)			Date: 10/26/2017	
Type: Horizontal Heater Treater	# 1				
Comment:	Localized, oil-stained soil and historical accumulations of oily waste inside of separator 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. (treater)			Date: 11/24/2017	
Type: Vertical Separator	# 1				
Comment:	Localized, oil-stained soil and historical accumulations of oily waste inside of separator 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. (separator)			Date: 11/24/2017	
<b>Tanks and Berms:</b>					
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	300 BBLs	FIBERGLASS AST		
Comment:	Small puddle of water beneath loadout on NE side of produced water AST. 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. (PW tank)			Date: 11/24/2017	

<u>Paint</u>						
Condition						
Other (Content)						
Other (Capacity)						
Other (Type)						
<u>Berms</u>						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Adequate	Walls Sufficent		Adequate		
Comment:	Earthen berms shared with 110 bbl fiberglass PBV and separator shed. See photos.					
Corrective Action:						Date:
Contents	#	Capacity	Type	Tank ID	SE GPS	
OTHER	1	OTHER	Open Top		,	
Comment:	Open-top fiberglass skim tank lacks NFPA placard and volume labels. See photos. This corrective action remains unresolved from previous FIRs.					
Corrective Action:	Install sign to comply with Rule 210.d. (skim tank)					Date: 12/24/2017
<u>Paint</u>						
Condition						
Other (Content)						
Other (Capacity)	unknown					
Other (Type)	skim tank					
<u>Berms</u>						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Inadequate					
Comment:	Skim tank buried in SW pit berm, but lacks adequate secondary containment of its own. 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). (skim tank)					Date: 11/24/2017
Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	1	OTHER	PBV FIBERGLASS		,	
Comment:						
Corrective Action:						Date:
<u>Paint</u>						
Condition						
Other (Content)						
Other (Capacity)						
Other (Type)						
<u>Berms</u>						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Adequate	Walls Sufficent		Adequate		
Comment:	Earthen berms shared with fiberglass produced water AST and separator shed. See photos.					
Corrective Action:						Date:
Contents	#	Capacity	Type	Tank ID	SE GPS	

CRUDE OIL	2	300 BBLs	STEEL AST		
Comment:	Localized, oil-stained soil underlying valves attached to 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. (crude oil ASTs)				Date: 11/24/2017
<b>Paint</b>					
Condition					
Other (Content)					
Other (Capacity)					
Other (Type)					
<b>Berms</b>					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Sufficient		Inadequate	
Comment:	Earthen berms are eroded and in need of repair. 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: 11/24/2017
<b>Venting:</b>					
Yes/No					
Comment:					
Corrective Action:					Date:
<b>Flaring:</b>					
Type					
Comment:					
Corrective Action:					Date:



**Environmental****Spill/Remediation:**

Comment: Remediation Project #1836 documents previous operator's intent to apply oil-saturated soils to area north of produced water pit for land treatment. Field inspection report and attachments dated 3/15/2006 (doc #2090054) document continued TPH impacts at pit complex. To date, neither current nor previous operator have filed follow-up compliance documentation to COGCC. Operator contacted the COGCC on 10/27/2017 to briefly discuss active remediation project.

Corrective Action: Contact EPS Steven Arauza to discuss closure requirements and submission requirements for REM #1836. Provide update to EPS Rick Allison regarding status of Remediation Project #9287.

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: Deep ruts at NW, SW, and SE sides of pump jack have allowed precipitation to pool on-site during previous inspections. While no precipitation was observed on date of this report, the ruts and depressions remained at the well pad.

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: 11/24/2017

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Type: Produced Water      Lined: NO      Pit ID: 273442      Lat: 40.621210      Long: -104.075049

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: 90      Width: 40

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date: c

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment: No fence

Corrective Action: \_\_\_\_\_

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

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment: No net

Corrective Action: \_\_\_\_\_

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

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: \_\_\_\_\_ 2+ feet Freeboard: \_\_\_\_\_

Comment: Localized, oil-stained soil and weeds at SW corner of pit, near skim tank outlet, and NE corner of pit, near plumbing to secondary pit. See photos. This corrective action remains unresolved from previous FIR.

Corrective Action: \_\_\_\_\_

Date: 10/26/2017

Type: Produced Water      Lined: NO      Pit ID: 273443      Lat: 40.621436      Long: -104.074689

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date: c

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment: No fence

Corrective Action: \_\_\_\_\_

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



**Netting:**

Netting Type:

Netting Condition:

Comment: No net

Corrective  
Action

Date:

Anchor Trench Present:

Oil Accumulation:

2+ feet Freeboard:

Comment:

Uncontrolled weeds growing in and around pit. See Housekeeping section for corrective actions. Significant burrow damage observed around pit berms. Oil-stained soil inside of berms at north end of pit and SE corner.

Corrective  
Action

Date: 12/06/2017

Remove and properly dispose of oily waste, per Rule 907.e. (north pit)

**Attached Documents**

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

Document Num	Description	URL
401475587	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4316670">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4316670</a>
681700963	Field photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4316664">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4316664</a>