

**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:

12/19/2017

Submitted Date:

12/21/2017

Document Number:

681700964**FIELD INSPECTION FORM**
 Loc ID 319937 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 12400Name of Operator: BYRON OIL INDUSTRIES INCAddress: 154 CLARKSON EXECUTIVE PARKCity: BALLWIN State: MO Zip: 63011**Status Summary:**

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

**Findings:**28 Number of Comments15 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
Trujillo, Aaron		aaron.trujillo@state.co.us	
BYRON, RICHARD	636-391-8770	byronoil@aol.com	ALL INSPECTIONS
,		dnr_cogccengineering@state.co.us	
Legler, Paul		paulleglerpumping@yahoo.com	Pumper for Byron Oil Industries Inc
Chesson, Bob		robert.chesson@state.co.us	
Burn, Diana		diana.burn@state.co.us	
,		dnr_cogccenforcement@state.co.us	
Leonard, Mike		mike.leonard@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
114378	PIT	AC	06/22/2017		-	Price-Degenhart 1 Production Pit	AC
201942	WELL	PR	12/01/2014	OW	001-07346	PRICE-DEGENHART 1	PR

**General Comment:**

COGCC environmental inspection. Follow-up to Remediation Project #10531 and Field Inspection Report (FIR) #681700809. Modular, steel ASTs referenced in previous FIRs had been removed by operator prior to inspection date.

Three (3) out of the fifteen (15) corrective actions (CAs) included in this report are unresolved and their corresponding CA dates have expired. Where CAs required by previous FIRs remain unresolved, respective CA dates remain unchanged.

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
Type	TANK LABELS/PLACARDS		
Comment:	Skim tank lacks required NFPA Placard and volume label.		
Corrective Action:	Install signs on skim tank to comply with Rule 210.d.		Date: 01/21/2018
Type	BATTERY		
Comment:	Adequate		
Corrective Action:			Date:
Type	WELLHEAD		
Comment:	Adequate		
Corrective Action:			Date:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	OTHER		
Comment:	Oil-stained vegetation remaining inside of north berm of produced water pit. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (oily vegetation)		Date: 01/21/2018
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (excavated flowlines and assorted pipe) located NW of produced water pit. See photos.		
Corrective Action:	Comply with Rule 603.f. (flowlines)		Date: 03/21/2018
Type	DEBRIS		
Comment:	Assorted debris (corrugated sheet metal, wood, etc) inside of skim pit excavation and associated oily waste stockpiles. See photos.		
Corrective Action:	Comply with Rule 603.f. (debris)		Date: 01/21/2018

Overall Good: ☒

<b>Spills:</b>			
Type	Area	Volume	
Crude Oil	Treater	<= 1 bbl	
Comment:	Localized accumulations of oily waste inside of VHT shed. See photos.		
Corrective Action:	Remove and properly dispose of oily waste per Rule 907.e. (VHT shed)		Date: 01/21/2018
Produced Water	WELLHEAD	<= 1 bbl	
Comment:	Small pool of water remaining at wellhead indicates possible integrity issue, as indicated on previous Field Inspection Reports. Occasional bubbles from subsurface were observed inside of puddle on inspection date.		
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: 07/07/2017
Crude Oil	Tank	<= 1 bbl	
Comment:	Significant historical accumulations of oily waste beneath modular tanks appear to have been removed. No visual evidence remains of accumulations documented in previous FIRs (see photos). No excavation or disposal documentation has been provided to COGCC.		

Corrective Action:	Provide final disposition of oily waste formerly underlying modular tanks to COGCC EPS Steven Arauza.			Date:	01/12/2018
Other	Pump Jack	<= 1 bbl			
Comment:	Blow-through motor oil accumulation beneath prime mover exhaust. See photos.				
Corrective Action:	Remove and properly dispose of non-E&P waste, in accordance with Rule 907A.			Date:	01/21/2018

In Containment: No

Comment: Operator has addressed localized accumulations of non-E&P waste on northeast side of pump jack and at prime mover exhaust. Field photos confirm that non-E&P waste is beginning to accumulate again at these locations. See Equipment section for corrective actions.

☒ Multiple Spills and Releases?

<b>Fencing/:</b>					
Type	TANK BATTERY				
Comment:	Barbed wire fence				
Corrective Action:					Date:
Type	SEPARATOR				
Comment:	Barbed wire fence				
Corrective Action:					Date:
Type	PIT				
Comment:	Wire fence around produced water pit.				
Corrective Action:					Date:

<b>Equipment:</b>				corrective date	
Type: Ancillary equipment	# 1				
Comment:	Propane tank at pump jack.				
Corrective Action:					Date:
Type: Ancillary equipment	# 1				
Comment:	Chemical storage drum at pump jack has adequate secondary containment.				
Corrective Action:					Date:
Type: Pump Jack	# 1				
Comment:	Localized accumulations of lube oil beginning to accumulate on northeast side of pump jack. 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. (pump jack)				Date: 01/21/2018
Type: Vertical Heater Treater	# 1				
Comment:	Localized, oil-stained soil and audible gas leak observed inside of treater shed. 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. (VHT)				Date: 01/21/2018
Type: Prime Mover	# 1				
Comment:	Blow-through oil beginning to accumulate beneath prime mover exhaust. 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 exhaust)				Date: 01/21/2018

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
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OTHER	1	OTHER			
Comment:	1550 gallon skim tank has been installed at NE corner of produced water pit to replace unlined earthen skim pit. See photos.				
Corrective Action:					Date:

Paint

Condition					
Other (Content)	skim tank				
Other (Capacity)	1550 gal				
Other (Type)					

Berms

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

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLS	STEEL AST		
Comment:					
Corrective Action:					
					Date:

Paint

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

Berms

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

Venting:

Yes/No	YES		
Comment:	On inspection date, an audible gas leak was detected inside of VHT shed. Inspector's personal 4-gas meter indicated presence of H2S gas inside of shed. Operator's pumper was contacted on 12/20/2017 and informed of leak and H2S detection. Pumper informed COGCC that he would visit the location to address the leak on the same day (12/20/2017).		
Corrective Action:	Contact COGCC_Engineering@state.co.us with resolution plan for potential H2S gas.		Date: 01/12/2018

Flaring:

Type			
Comment:			
Corrective Action:			Date:

Inspected Facilities									
Facility ID:	114378	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	AC
Facility ID:	201942	Type:	WELL	API Number:	001-07346	Status:	PR	Insp. Status:	PR

## Environmental

**Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)		
Oily Soil	Piles	Adequate	39.830800	-103.857502	
Comment	Two (2) stockpiles of oily waste on top of plastic liners (approximately 100 cu. yd.) are located on NW and NE sides of open skim pit excavation, see photos. See Spill/Remediation section for corrective actions.				
Corrective Action					Date:

**Spill/Remediation:**

Comment:	Plan to remediate and close former skim pit (facility ID #104647) is proceeding under approved Site Investigation and Remediation Workplan (project #10531). Operator's initial Form 27 does not include anticipated completion dates for approved workplan.			
Corrective Action:	Provide remediation project status update to COGCC. Remediation and pit closure shall be completed no later than April 30, 2018.			
	Date: 01/12/2018			

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.

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: 08/17/2017

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

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: \_\_\_\_\_

Corrective Action

Date: c

**Fencing:**

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

Comment: Trace amounts (<1%) of free-phase hydrocarbons observed on pit. See photos. Operator shall continue to remove accumulations of free product from pit as routine maintenance.

Corrective Action

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

**Netting:**

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

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

Corrective Action

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

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

Comment: Pit did not demonstrably contain 2' of freeboard. No method of monitoring and maintaining freeboard was observed during inspection. Operator has been instructed to install freeboard monitoring method in previous FIRs.

Corrective Action

Immediately install method of monitoring and maintaining at least 2' of freeboard, per Rule 902.b.

Date: 08/14/2017

**Attached Documents**

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

Document Num	Description	URL
401494171	INSPECTION SUBMITTED	<a href="http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333453">http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333453</a>
681700971	December 19 2017 Field Photos	<a href="http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333449">http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333449</a>