

**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:

03/08/2018

Submitted Date:

03/26/2018

Document Number:

681701006

**FIELD INSPECTION FORM**

Loc ID 319937 Inspector Name: Arauza, Steven On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 12400  
Name of Operator: BYRON OIL INDUSTRIES INC  
Address: 154 CLARKSON EXECUTIVE PARK  
City: BALLWIN State: MO Zip: 63011

**Findings:**

- 29 Number of Comments
- 15 Number of Corrective Actions
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
Trujillo, Aaron		aaron.trujillo@state.co.us	
Chesson, Bob		robert.chesson@state.co.us	
Legler, Paul	970-768-0950	paulleglerpumping@yahoo.com	Pumper for Byron Oil Industries Inc
Leonard, Mike		mike.leonard@state.co.us	
BYRON, RICHARD	636-391-8770	byronoil@aol.com	ALL INSPECTIONS
,		dnr_cogccenforcement@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
104647	PIT	AC	06/22/2017		-	Price-Degenhart 1 Skim Pit	AC
114378	PIT	AC	06/22/2017		-	Price-Degenhart 1 Production Pit	AC
201942	WELL	PR	12/01/2014	OW	001-07346	PRICE-DEGENHART 1	EI

**General Comment:**

COGCC Environmental Inspection, follow-up to Field Inspection Report #681700964, Remediation Project #10531, and NOAV #401497449.

**Location**

Overall Good:

<b>Signs/Marker:</b>			
Type	BATTERY		
Comment:	Adequate		
Corrective Action:			Date:
Type	WELLHEAD		
Comment:	Adequate		
Corrective Action:			Date:
Type	TANK LABELS/PLACARDS		
Comment:	Skim tank lacks required NFPA placard, as indicated in previous FIRs. Operator has added volume label in response to previous FIR. See photos.		
Corrective Action:	Install signs on skim tank to comply with Rule 210.d.		Date: 01/21/2018

Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: _____

<b>Good Housekeeping:</b>			
Type	WEEDS		
Comment:	Uncontrolled weeds at SE corner of pump jack and inside of crude oil AST berm. See photos.		
Corrective Action:	Comply with Rule 603.f. (weeds).		Date: 04/06/2018

Overall Good:

<b>Spills:</b>			
Type	Area	Volume	
Crude Oil	WELLHEAD	<= 1 bbl	
Comment:	Localized, oil-stained soil spray at wellhead stretching ~20' to SE. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e (wellhead).		Date: 04/27/2018
Other	Pump Jack	<= 1 bbl	
Comment:	Blow-through motor oil accumulation beneath prime mover exhaust, as indicated in previous FIR. See photos.		
Corrective Action:	Remove and properly dispose of non-E&P waste, in accordance with Rule 907A. (blow-through oil)		Date: 04/27/2018
Crude Oil	Tank	<= 1 bbl	
Comment:	Localized accumulations of oily waste beneath valves on both sides of crude oil AST. See photos.		
Corrective Action:	Remove and properly dispose of oily waste, per Rule 907.e. (crude oil AST)		Date: 04/27/2018
Produced Water	WELLHEAD	<= 1 bbl	
Comment:	Small pool of water remaining at wellhead indicates possible integrity issue, as indicated on previous Field Inspection Reports. Bubbling described in previous FIRs was not observed on inspection date, though well appeared to be SI on date of inspection. 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. (wellhead)		Date: 07/07/2017

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type	PIT		
Comment:	Wire fence around produced water pit.		
Corrective Action:			Date:
Type	TANK BATTERY		
Comment:	Barbed wire fence.		
Corrective Action:			Date:
Type	SEPARATOR		
Comment:	Barbed wire fence.		
Corrective Action:			Date:

**Equipment:**

Type: Ancillary equipment	# 1		corrective date
Comment:	Propane tank at pump jack.		
Corrective Action:			Date:
Type: Pump Jack	# 1		
Comment:	Accumulation of oily waste extending ~20' to SE of wellhead. Accumulation of blow-through motor oil extending from prime mover exhaust, as indicated in previous FIRs. 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. (wellhead)		Date: 01/21/2018
Type: Vertical Heater Treater	# 1		
Comment:	Localized accumulation of oily waste on SE side of vertical heater treater. 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: Ancillary equipment	# 1		
Comment:	Chemical storage drum at pump jack has adequate secondary containment.		
Corrective Action:			Date:

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	1	<50 BBLS	PBV PLASTIC		,
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	<input type="text"/>
Other (Content)	produced water with crude oil
Other (Capacity)	35 bbls
Other (Type)	<input type="text"/>

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Inadequate	Walls Insufficient		Inadequate	
Comment: Earthen berms surrounding skim tank insufficient to contain tank contents plus precipitation. See photos.					
Corrective Action: Repair or install berms or other secondary containment devices per Rule 605.a.(4). (skim tank)				Date:	04/27/2018
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		
Comment: Localized accumulations of oily waste beneath valves on both sides of crude oil AST. 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. (crude oil AST)				Date:	04/27/2018

**Paint**

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

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate	Walls Sufficient		Adequate	
Comment: Earthen berms adequate, but will require maintenance soon due to erosion and vegetation growth. See photos.					
Corrective Action:				Date:	

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 104647 Type: PIT API Number: - Status: AC Insp. Status: AC

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: EI

**Environmental**

**Spills/Releases:**

Type of Spill: OTHER E&P WASTE Estimated Spill Volume: \_\_\_\_\_

Comment: Historical accumulations of oily waste remaining at area formerly underlying modular steel ASTs. See photos. Operator was instructed in 12/28/2017 FIR #681700964 to provide documentation of disposition of oily waste no later than 1/12/2018. Required documentation has not been received.

Corrective Action: Immediately provide documentation of disposition of oily waste. Collect a minimum of three (3) confirmation samples from area formerly underlying modular steel ASTs from depths of 6-12", analyze for TPH and BTEX to document compliance with Table 910-1. Date: 04/27/2018

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)
Used Oil	Other	Inadequate	
Comment	<span style="color: blue;">Open, 5-gallon bucket used to capture motor oil from prime mover was within 2" of overflowing on inspection date. See photos.</span>		
Corrective Action	<span style="color: red;">Contact COGCC EPS to discuss motor oil waste management practice.</span>		Date: <u>04/06/2018</u>

**Spill/Remediation:**

Comment: Workplan approved under Remediation Project #10531 indicates that skim pit would be backfilled with clean fill material. Operator's response to NOAV (doc #401564808-attached) indicates that pit was backfilled using sediment from nearby pasture that had accumulated as a result of off-site sediment transport from produced water pit.

Corrective Action: Provide representative confirmation samples of soil from skim pit excavation and backfill material to document pH, conductivity, and SAR compliance with Table 910-1 via Supplemental eform 27. Supplemental eform 27 shall also indicate total volume of waste disposed and include an attached sample location diagram with sample depths. Date: 04/27/2018

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: Straw wattles installed on west and south sides of produced water pit berms in response to previous FIR. Off-site sediment transport remains evident along east berm and at NE corner of production pit. See photos.

Corrective Action: 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 and seek professional stormwater control technician, if necessary, to assist in stabilizing site.

Date: 04/27/2018

**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: Livestock Fencing Condition: Adequate

Comment: Trace amounts (<1%) of free-phase hydrocarbons observed along with accumulation of oily waste inside of south pit berm. See photos.

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

Date: 04/27/2018

**Netting:**

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

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

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

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

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

Comment: T-post installed inside north pit berm to monitor freeboard in response to previous FIR. See photos.

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

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

Type: Skimming/Settling Lined: NO Pit ID: 104647 Lat: 39.830810 Long: -103.857291

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

**Lining:**

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

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

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

Date: c

**Fencing:**

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

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

Corrective Action		Date:
<b>Netting:</b>		
Netting Type:	Netting Condition:	
Comment:		
Corrective Action		Date:
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:
Comment:	Former skim pit has been backfilled and replaced with 35 bbl skim tank under Remediation Project #10531.	
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
401587376	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414303">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414303</a>
681701009	Operator response to NOAV	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414285">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414285</a>
681701021	Field photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414286">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4414286</a>