

**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:

09/20/2018

Submitted Date:

11/08/2018

Document Number:

694100008**FIELD INSPECTION FORM**Loc ID 313873 Inspector Name: AXELSON, JOHN On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 79905Name of Operator: SMITH OIL PROPERTIES INCAddress: PO BOX 219City: BYERS State: CO Zip: 80103**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**6 Number of Comments3 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Shelley, Vicki	303-825-7405	smithoilprop@aol.com	
Trujillo, Aaron		aaron.trujillo@state.co.us	
Young, Rob		rob.young@state.co.us	
Jeremy Pike		jpike@ltenv.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
109707	PIT	AC			-	J.A. FARMS	EI
109708	PIT	AC			-	J.A. FARMS	EI
109709	PIT	AC			-	J.A. FARMS	EI
226642	WELL	SI	06/01/2017	GW	087-07380	J. A. FARMS 1	EI

General Comment:

This inspection replaces the original inspection (Doc #679500253) to correct an error. In the original inspection it was alleged that Pit Facility #109709 was closed without a Form 27 in violation of Rule 905.b. In fact, a Form 27 was submitted and documented the proper closure of the pit under Remediation Project #5480. All other documentation and corrective actions from the previous inspection are included herein.

This is an environmental inspection in response to complaint #200446278.

On September 20, 2018, COGCC East Environmental Supervisor, John Axelson, met on location with Northeast Reclamation Specialist, Aaron Trujillo and the complainant who is the surface owner.

This inspection addresses environmental issues including contaminated soils, pit status for Facility ID #s 109707, 109708 & 109709, and follow up regarding Spill Doc #2230022 and open remediation projects 7232 & 7403.

Please refer to Field Inspection Document #682503911 for reclamation and stormwater issues.

Any corrective actions from previous inspections that have not been completed are still applicable.

Inspected Facilities

Facility ID: <u>109707</u>	Type: <u>PIT</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>109708</u>	Type: <u>PIT</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>109709</u>	Type: <u>PIT</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>226642</u>	Type: <u>WELL</u>	API Number: <u>087-07380</u>	Status: <u>SI</u>	Insp. Status: <u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: OIL

Estimated Spill Volume: _____

Comment: Operator submitted Form 6S (Doc #401418630) stating the well was plugged on 8/15/2017. As a result, final reclamation including removal of all E&P waste, junk, trash, unused equipment, non-E&P waste and remediation and closure of pits should have been completed by 8/15/2018. Several areas of localized oil stained soil were observed at the pumping unit, former tank battery and pit complex. In addition, accumulations of apparent lube oil non-E&P waste were observed around the base of the pumping unit.

Corrective Action: Immediately remove all oily waste and properly dispose in accordance with Rule 907.e. In addition, properly dispose of all non-E&P waste (lube oil impacted soil) in accordance with Rule 907.A.

Date: 08/15/2018

Reportable: _____

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

Spill/Remediation:

Comment: Historic spill from the wellhead reported in 2012 (Spill Doc #2230022) was not successfully remediated. Area of spill path from wellhead to southwest still does not support adequate vegetation. Wattles installed in former spill area are not functioning and are considered debris. Remediation Projects 7232 & 7403 were subsequently submitted to address the spill and cleanup of petroleum contaminated soils at pumping unit, pit complex and tank battery as well as closure of the skim pit (Fac #109707). Information provided with Remediation Project #7403 verified removal of petroleum contaminated soil and verified compliance with Table 910-1 standards. COA for remediation project required notice of completion submitted via Sundry Form 4 after all excavations were backfilled and disturbed areas reclaimed. Notice of completion was not received, as a result, both remediation projects are still open. Rem #7403 had an anticipated completion date of 11/30/12. Former skim pit excavation (15' x 20') is still open, believed to have been used for the skim vessel. Localized oil stained soil remains at skim pit excavation.

Corrective Action: Spill #223022 was not successfully remediated. Collect an adequate number of soil samples from former spill area to verify compliance with Table 910-1 standards for EC, pH and SAR. If samples exceed Table 910-1 standards, provide supplemental Form 27 for Rem #7403 to remediate impacts. If samples comply with Table 910-1, perform appropriate reclamation. Remove additional oily waste from former skim pit excavation area. Document removal of site-wide and skim pit oily waste via supplemental Form 27 for Rem #7403.

Date: 11/30/2012

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 PIT

Type: Produced Water Lined: NO Pit ID: 109709 Lat: 40.383174 Long: -103.888273

Reference Point: Other: Length: Width:

Lining:Liner Type: Liner Condition:

Comment:

Areas of surface impact devoid of vegetation located along south and west berms of former pit were documented during inspection. Pit was previously closed under Remediation Project #5480. Areas of surface impact shall be addressed during additional site-wide remediation and/or reclamation.

Corrective Action: Date: **Fencing:**Fencing Type: Fencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Netting Condition: Comment: Corrective Action: Date: Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard: Comment: Corrective Action: Date:

Type: Produced Water Lined: NO Pit ID: 109708 Lat: 40.383194 Long: -103.887780

Reference Point: Other: Length: Width:

Lining:Liner Type: Liner Condition:

Comment:

Unlined produced water pit is still open. Stormwater from east side of location is accumulating in pit during storm events. Pit should have been remediated and properly closed under an approved Form 27 no later than 8/15/2018.

Corrective Action: Date: 08/15/2018

Submit a Form 27 for Prior COGCC approval in accordance with Rule 905.b. to properly close the produced water pit. Provide proposed sample location diagram with the Form 27. Do not close pit without an approved Form 27. Provide implementation schedule with Form 27. Immediately install appropriate bmps to prevent stormwater accumulation in pit to allow it to dry out for closure.

Fencing:Fencing Type: Fencing Condition:

Comment:		Date:
Corrective Action		
Netting:		
Netting Type:	Netting Condition:	
Comment:		Date:
Corrective Action		
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:
Comment:		Date:
Corrective Action		

COGCC Comments

Comment	User	Date
Pictures attached to document conditions at time of inspection. Also refer to pictures attached to reclamation Field Inspection Form Doc #682503911.	axelsonj	11/08/2018
Operator shall make good faith effort to notify and consult with surface owner prior to commencing remediation and pit closure activities. Consultation shall include providing plans of additional work and schedule to complete.		

Attached Documents

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

Document Num	Description	URL
401832878	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4639920
694100009	Inspection Pictures	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4639919