

**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:

04/29/2019

Submitted Date:

04/30/2019

Document Number:

696100832**FIELD INSPECTION FORM**Loc ID 317496 Inspector Name: Evins, Bret On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 42950Name of Operator: INDUSTRIAL GAS SERVICES INCAddress: 4891 INDEPENDENCE ST STE 200City: WHEATRIDGE State: CO Zip: 80033**Status Summary:**

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

Findings:20 Number of Comments9 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 |
|--------------------|-------|----------------------------------|---------------------------------|
| , | | dnr_cogccengineering@state.co.us | |
| , | | igsinc@att.net | All Inspections |
| Pesicka, Conor | | conor.pesicka@state.co.us | |
| Allison, Rick | | rick.allison@state.co.us | |
| Schlagenhauf, Mark | | mark.schlagenhauf@state.co.us | |
| Gomez, Jason | | jason.gomez@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 238354 | WELL | SI | 05/01/2016 | GW | 123-05198 | BEHRING 1 | SI |

General Comment:

[This is a WELL & BATTERY inspection.](#)

[Well: SI](#)

[Entire battery & equipment is shut-down.](#)

| Location | | | |
|--|---|-------|-------------------------|
| Lease Road: | | | |
| Type | Access | | |
| comment: | Adequate | | |
| Corrective Action | L | Date: | |
| Overall Good: <input type="checkbox"/> | | | |
| Signs/Marker: | | | |
| Type | TANK LABELS/PLACARDS | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type | WELLHEAD | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type | BATTERY | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Emergency Contact Number: | | | |
| Comment: | | | |
| Corrective Action: | | | Date: _____ |
| Good Housekeeping: | | | |
| Type | WEEDS | | |
| Comment: | This FIR: Weed encroachment at wellsite & pit excavation area. Remove, manage, & control weeds around wellsite. Refer to Rule 603.f (10 Days). Comply with Rule 603.f. Corrective Action date: 05/10/2019. See photos #2, 10. | | |
| Corrective Action: | Remove, manage, & control weeds at wellsite & pit excavation area. Refer to Rule 603.f (10 Days). Comply with Rule 603.f. See photos #2, 10. | | Date: <u>05/10/2019</u> |
| Type | WEEDS | | |
| Comment: | Prior FIR: Weed encroachment at crude oil tanks, produced H2O tank, & heater treater sites. Remove, manage, & control weeds at crude oil tanks, produced H2O tank, & heater treater sites. Refer to Rule 603.f (10 Days). Comply with Rule 603.f. Original Corrective Action date: 11/03/2017. See photos #5, 6, 17, 18. Prior CA remains applicable. | | |
| Corrective Action: | Remove, manage, & control weeds at crude oil tanks, produced H2O tank, & heater treater sites. Comply with Rule 603.f. Original Corrective Action date: 11/03/2017. Prior CA remains applicable. | | Date: <u>11/03/2017</u> |
| Type | UNUSED EQUIPMENT | | |

| | | | |
|--------------------|---|-------|------------|
| Comment: | Prior FIR: Unused Equipment (Pipe) at S. side of pit. Refer to Rule 603.f for guidance. (30 Days). Remove unused equipment at S. side of pit. Comply w/ Rule 603.f. Original Corrective Action date: 11/17/2016. See photos #7, 8. | | |
| Corrective Action: | Remove unused equipment at S. side of pit. Comply w/ Rule 603.f. Original Corrective Action date: 11/17/2016. Prior CA remains applicable. | Date: | 11/17/2016 |

Overall Good: ☐

| | | | |
|--------------------|--|----------|------------|
| Spills: | | | |
| Type | Area | Volume | |
| Crude Oil | WELLHEAD | <= 1 bbl | |
| Comment: | Prior FIR: Stained soil at wellsite. Stained soil at pumping unit engine house. Stained soil at crude oil tanks loadout. Remove or remediate stained soil & oily waste. Material around wellhead has been worked but impacted soil remains in place. Visual and odor evidence of hydrocarbon impacts to soil remain present. Original Corrective Action date: 09/19/2016. See photos #1, 2, 11, 12, 15, 16. Prior CA remains applicable. | | |
| Corrective Action: | Remove or remediate stained soil; Securely fasten all valves, pipes, and fittings to ensure good mechanical condition per Rule 605.d. Oily soil must be handled in accordance with Rule 907.e. but cannot be added to existing land treatment area - see remediation section of this inspection report regarding land treatment area. Original Corrective Action date: 09/19/2016. See photos #1, 2, 11, 12, 15, 16. Prior CA remains applicable. | | |
| | | Date: | 09/19/2016 |

In Containment: No

Comment:

☐ Multiple Spills and Releases?

| | | | |
|--------------------|------------|-------|--|
| Fencing/: | | | |
| Type | PUMP JACK | | |
| Comment: | Iron panel | | |
| Corrective Action: | | Date: | |

| | | | |
|--------------------------|--|-------|-----------------|
| Equipment: | | | corrective date |
| Type: Prime Mover | # 1 | | |
| Comment: | Gas Engine. Stained soil at engine house. See Spills section. | | |
| Corrective Action: | | Date: | |
| Type: Bird Protectors | # 1 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type: Gas Meter Run | # 1 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |
| Type: Deadman # & Marked | # 4 | | |

| | | | |
|---|-----|------------------|--|
| Comment: 4 / 4. | | | |
| Corrective Action: | | Date: | |
| Type: Flow Line | # 1 | | |
| Comment: Prior FIR: Flowlines from treater to former pit NOT properly abandoned. Refer to Rule 1103 for guidance. Original Corrective Action date: 03/20/2017. See photos #9, 10. | | | |
| Corrective Action: Properly abandon flowlines to former pit. Comply w/ Rule 1103. Original Corrective Action date: 03/20/2017. See photos #9, 10. Prior CA remains applicable. | | Date: 03/20/2017 | |
| Type: Pump Jack | # 1 | | |
| Comment: Stained soil at wellsite; see Spills section. | | | |
| Corrective Action: | | Date: | |
| Type: Bradenhead | # 1 | | |
| Comment: Bradenhead does NOT appear plumbed to surface. | | | |
| Corrective Action: | | Date: | |
| Type: Vertical Heater Treater | # 1 | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Tanks and Berms:

| Contents | # | Capacity | Type | Tank ID | SE GPS |
|--------------------|---|----------|-------------|---------|-----------------------|
| PRODUCED WATER | 1 | OTHER | PLASTIC AST | | 40.440350,-104.170070 |
| Comment: | | | | | |
| Corrective Action: | | | | | Date: |

Paint

| | |
|------------------|----------|
| Condition | |
| Other (Content) | |
| Other (Capacity) | 40 Bbls. |
| Other (Type) | |

Berms

| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance | |
|--|----------|---------------------|---------------------|------------------|-----------------------|
| Earth | Adequate | Walls Insufficient | Base Sufficient | Inadequate | |
| Comment: Prior FIR: Produced H2O tank berm integrity compromised. Erosion in and on berms. Maintain berms to comply w/ Rule 906.d(1). Original Corrective Action date: 04/09/2017. | | | | | |
| Corrective Action: Maintain berms to comply w/ Rule 906.d(1). Original Corrective Action date: 04/09/2017. Prior CA remains applicable. | | | | Date: 04/09/2017 | |
| Contents | # | Capacity | Type | Tank ID | SE GPS |
| CRUDE OIL | 2 | OTHER | STEEL AST | | 40.440581,-104.169996 |

| | | |
|--------------------|--|------------------|
| Comment: | Prior FIR: Rust on crude oil tank. Repair & paint tanks to comply w/ Rule 804 & 605.d (Visual & Mechanical conditions). Original Corrective Action date: 04/24/2018. See photos #13, 14. Prior CA remains applicable. | |
| Corrective Action: | Repair & paint tanks to comply w/ Rule 804 & 605.d (Visual & Mechanical conditions). Original Corrective Action date: 04/24/2018. See photos #13, 14. Prior CA remains applicable. | Date: 04/24/2018 |

Paint

| | | |
|------------------|------------|--|
| Condition | Inadequate | |
| Other (Content) | | |
| Other (Capacity) | 210 Bbls. | |
| Other (Type) | | |

Berms

| Type | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |
|--------------------|--|---------------------|---------------------|------------------|
| Earth | Inadequate | Walls Insufficient | Base Sufficient | Inadequate |
| Comment: | Prior FIR: Crude oil tanks berm integrity compromised. Erosion & burrows in and on berms. Maintain berms to comply w/ Rule 906.d(1). Original Corrective Action date: 04/09/2017. See photos #17, 18. Prior CA remains applicable. | | | |
| Corrective Action: | Maintain berms to comply w/ Rule 906.d(1). Original Corrective Action date: 04/09/2017. See photos #17, 18. Prior CA remains applicable. | | | Date: 04/09/2017 |

Venting:

| | | | |
|--------------------|--|-------|--|
| Yes/No | NO | | |
| Comment: | No audible venting at wellhead, risers at pit. | | |
| Corrective Action: | | Date: | |

Flaring:

| | | |
|--------------------|--|-------|
| Type | | |
| Comment: | | |
| Corrective Action: | | Date: |

Inspected FacilitiesFacility ID: 238354 Type: WELL API Number: 123-05198 Status: SI Insp. Status: SI**Idle Well**Purpose: ☒ Shut In ☐ Temporarily Abandoned Reminder: _____Comment: SI. Last produced Apr 2016. >2 years SI without MIT. No current MIT on record or delinquent as required by Rule 326.Corrective Action: Contact dnr_cogccengineering@state.co.us with resolution plan for SI status. Comply w/ Rule 326.

Date: _____

Reclamation - Storm Water - Pit**Storm Water:**

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Gravel | Pass | Gravel | Pass | | | |

Comment: Corrective Action: Date: **Pits:** ☐ NO SURFACE INDICATION OF PITType: Lined: Pit ID: 118488 Lat: 40.440308 Long: -104.170424Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition: Comment: 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: **COGCC Comments**

| Comment | User | Date |
|---|--------|------------|
| <p>COGCC Inspection Report Summary: On MON 04/29/2019 at approximately 12:47 hrs. I, Bret Evins, conducted an on-site inspection at: Operator Name: INDUSTRIAL GAS SERVICES INC. Location Name: BEHRING-66N61W /35SESE Location ID: 317496 Location County: Weld County, Colorado While there, I observed: Well(s) - 1: SI Entire battery & equipment is shut-down.</p> <p>Follow-up to FIR #684904636 dated 10/24/2017. ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE. Prior Corrective Action dates remain applicable.</p> | evinsb | 04/30/2019 |

7 of 7 - Corrective Actions from prior FIR NOT addressed.

1.) Weed encroachment at crude oil tanks, produced H2O tank, & heater treater sites.
Remove, manage, & control weeds at crude oil tanks, produced H2O tank, & heater treater sites.

Refer to Rule 603.f (10 Days).

Comply with Rule 603.f. Original Corrective Action date: 11/03/2017.

See photos #5, 6, 17, 18.

2.) Unused Equipment (Pipe) at S. side of pit.

Refer to Rule 603.f for guidance. (30 Days).

Remove unused equipment at S. side of pit. Comply w/ Rule 603.f.

Original Corrective Action date: 11/17/2016.

See photos #7, 8.

3.) Spill & Stained soil at wellsite. <= 1 Bbl.

Stained soil at pumping unit engine house.

Stained soil at crude oil tanks loadout.

Remove or remediate stained soil & oily waste.

Material around wellhead has been worked but impacted soil remains in place. Visual and odor evidence of hydrocarbon impacts to soil remain present.

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. Comply w/ Rule 605.d.

Oily soil must be handled in accordance with Rule 907.e. but cannot be added to existing land treatment area.

Original Corrective Action date: 09/19/2016.

See photos #1, 2, 11, 12, 15, 16.

4.) Flowlines from treater to former pit NOT properly abandoned.

Refer to Rule 1103 for guidance.

Properly abandon flowlines to former pit. Comply w/ Rule 1103.

Original Corrective Action date: 03/20/2017.

See photos #9, 10.

5.) Crude oil tanks berm integrity compromised.

Erosion & burrows in and on berms.

Maintain berms to comply w/ Rule 906.d(1).

Original Corrective Action date: 04/09/2017.

See photos #17, 18.

6.) Rust on crude oil tank.

Repair & paint tanks to comply w/ Rule 804 & 605.d (Visual & Mechanical conditions).

Original Corrective Action date: 04/24/2018.

See photos #13, 14.

7.) Maintain berms listed as CA twice.

2 - NEW Corrective Actions observed on this FIR.

1.) Weed encroachment at wellsite & pit excavation area.

Remove, manage, & control weeds at wellsite & pit excavation area. Refer to Rule 603.f (10 Days).

Comply with Rule 603.f.

Corrective Action date: 05/10/2019.

See photos #2, 10.

2.) Last produced Apr 2015. >2 years SI without MIT. No current MIT on record or delinquent as required by Rule 326

Last production record is for Jul 2016.

Contact dnr_cogccengineering@state.co.us with resolution plan for SI status.

Comply w/ Rule 326.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

This is a summary of the inspection report.

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------|---|
| 696100833 | Site photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811115 |