

**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:

08/26/2019

Submitted Date:

09/03/2019

Document Number:

694500125**FIELD INSPECTION FORM**Loc ID 428531 Inspector Name: NEIDEL, KRIS On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 95520Name of Operator: WESCO OPERATING INCAddress: 120 S DURBIN STREETCity: CASPER State: WY Zip: 82602**Status Summary:**

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

**Findings:**6 Number of Comments5 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
Waldron, Emily		emily.waldron@state.co.us	
kirkwood, tom	307-472-4618	tomk@kirkwoodcompanies.com	
Weinert, Dave	307-577-5329	davew@kirkwoodcompanies.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428531	LOCATION	AC			-	Maudlin Gulch Tank Battery	EI

**General Comment:**

On 8/26/2019 COGCC staff, Kris Neidel inspected Spill ID 467136 that originated from the Maudlin Gulch tank battery. The spill was verbally reported to COGCC on 8/24/2019. Weather was clear, dry and 82 degrees. COGCC was informed by Wesco staff, that the cause of the spill was the water injection pumps (that send fluid to injection wells) went down while the wells were producing, causing fluid to overtop three (3) production tanks. The spilled fluid was reported to be a mixture of Crude Oil and Water. It was discovered that no auto shut off protection was installed at the time of spill. Fluid filled up the tank battery secondary containment and flowed to the north splitting into two separate flow paths at the injection building. One flow path went through the injection pump building and to the east of the injection building through an approximate 15-foot wide area between the shop and a bermed, elevated dry ditch, then continued north, between the Wesco Shop and the bermed, dry ditch. The fluid went into an upper pit that contained approximately four feet of water and cattails. The fluid then went through culverts that control fluid level in upper pit to a second lower pit. At what depths along the berms of the pits are the inlets and outlets of the culverts. The lower pit had approximately four feet of water and cattails. The second spill path flowed along the west side of the injection building and down the access road approximately 300 feet, this path terminated in the road. Wesco employees were observed applying a peat-based amendment (Sphag Sorb) to the surface of the water in the two pits. COGCC staff walked the spill paths and observed; oil on vegetation in the pits, oil on water in the pits, oil staining in the culvert between the two pits, the culvert exiting the second pit was observed to be free of oil staining. Crews were cleaning tanks that had been over topped. No hydrocarbon was observed in the Gulch. Straight Gulch was estimated to have a flow rate of 1 gal/min. At the time of inspection, visibly impacted soil from the access road spill path, had been scraped and stockpiled on the road, it appeared that approximately 1 yard of soils was stockpiled. COGCC staff was told that one load of impacted soil had been taken to the Meeker landfill for disposal.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Trash, a bucket, was observed in the pit that is being closed near the tank battery.		
Corrective Action:	Remove all Trash, listed or otherwise.		Date: 09/13/2019

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS	
CRUDE OIL	7	400 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	Inadequate	Walls Sufficient	Base Insufficient	Inadequate
Comment:	Wesco should evaluate the tank battery for volume and impermeability.			
Corrective Action:	Tank Berms should be updated to comply with rule 605.a(4). Demonstration that tank battery is compliant with this rule should be provided to COGCC.			Date: 10/03/2019

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate		
Comment	Soil that was removed from the road was scraped and piled on the road.			
Corrective Action	Soil should be disposed and stored as E&P waste.			Date: 09/25/2019
Oily Soil	Pits	Inadequate		
Comment	The spilled fluid flowed into two pits that Wesco refers to as "Emergency containment pits". The pits are not currently permitted or shown as Wesco as the operator.			
Corrective Action	Wesco should complete a form 15, pit permit for their pits that are currently in use.			Date: 10/11/2019

**Spill/Remediation:**

Comment:	The spill was reported on spill number 467136. Communication on this spill should continue on the eForm 19 and 27.		
Corrective Action:	A form 27 should be submitted that outlines how; impacts will be remediated, demonstration will be provided that documents all remaining impacted material are below COGCC table 910-1 concentrations. Discrete soil samples shall be collected along the two flow paths of the spill, and from the "Emergency Containment Pits".		
			Date: 09/24/2019

Emission Control Burner (ECB): \_\_\_\_\_

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

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

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

Document Num	Description	URL
402164806	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4927535">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4927535</a>
694500126	photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4927523">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4927523</a>