

**FORM  
INSP**Rev  
X/20**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:

04/06/2021

Submitted Date:

04/07/2021

Document Number:

701500218

**FIELD INSPECTION FORM**Loc ID 336445 Inspector Name: Moran, Rick On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 200502

Name of Operator: 31 OPERATING

Address: 3021 RIDGE RD #156

City: ROCKWALL State: TX Zip: 75032

**Status Summary:**

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

**Findings:**

10 Number of Comments

5 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 |
|--------------------|--------------|----------------------------------|---------|
| Ikenouye, Teri     |              | teri.ikenouye@state.co.us        |         |
| Boulger, Levin     |              | lboulger@31operating.com         |         |
| Thompson, Bud      |              | BLThomps@BLM.gov                 |         |
| Rosenberg, Kelly   |              | kelly.rosenberg@state.co.us      |         |
| Pesicka, Conor     |              | conor.pesicka@state.co.us        |         |
| COGCC, Engineering | 303-894-2100 | dnr_cogccEngineering@state.co.us |         |
| Freeman, Kris      | 254-717-0435 | kfreeman@31operating.com         |         |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name       | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------------|-------------|
| 257851      | WELL | SI     | 10/01/2020  | GW         | 103-10042 | WRD FEDERAL 30-22   | SI          |
| 260196      | WELL | SI     | 10/01/2015  | GW         | 103-10137 | ANT HILL UNIT 30-23 | SI          |

**General Comment:**

A follow up inspection of documents:

- 1) Warning letter 401620934 dated 4-26-2018.
- 2) NOAV 401781123 dated 10-5-2018.
- 3) FIR 679703075 dated 2-27-2019.
- 4) FIR 679704606 dated 6-25-2019.

The following compliance issues are uncompleted:

- 1) Acquire MIT or plug well. Complete by 11-5-2018.

Additional compliance issues:

- 1) Gaps in metal secondary containment of tanks. Photos 7 & 8. Complete by 5-7-2021
- 2) Debris on location. Photos 1 to 6. Complete by 4-23-2021.
- 3) Erosion channel on edge of location. Photos 9 & 10. Complete by 6-7-2021.
- 4) Production history not current. Complete by 5-7-2021.

Location is within a Rule 1202.d Mule deer severe winter range area, Rule 1202.d Mule deer winter concentration area, and Rule 309.e.1 Greater sage grouse general habitat management area.

This is a summary of inspection report 701500218.

**Location**Overall Good: ☒

|                      |                      |       |  |
|----------------------|----------------------|-------|--|
| <b>Signs/Marker:</b> |                      |       |  |
| Type                 | TANK LABELS/PLACARDS |       |  |
| Comment:             |                      |       |  |
| Corrective Action:   |                      | Date: |  |
| Type                 | BATTERY              |       |  |
| Comment:             | Signs at wells.      |       |  |
| Corrective Action:   |                      | Date: |  |
| Type                 | WELLHEAD             |       |  |
| Comment:             |                      |       |  |
| Corrective Action:   |                      | Date: |  |

Emergency Contact Number:

Comment: 911

Corrective Action:

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

**Good Housekeeping:**

|                    |                     |       |            |
|--------------------|---------------------|-------|------------|
| Type               | DEBRIS              |       |            |
| Comment:           | Debris on location. |       |            |
| Corrective Action: | Remove debris.      | Date: | 04/23/2021 |

Overall Good: ☐

|                |      |        |  |
|----------------|------|--------|--|
| <b>Spills:</b> |      |        |  |
| Type           | Area | Volume |  |

In Containment: No

Comment:

☐ Multiple Spills and Releases?

|                                   |                            |       |                 |
|-----------------------------------|----------------------------|-------|-----------------|
| <b>Equipment:</b>                 |                            |       | corrective date |
| Type: Horizontal Heated Separator | # 1                        |       |                 |
| Comment:                          |                            |       |                 |
| Corrective Action:                |                            | Date: |                 |
| Type: Bradenhead                  | # 1                        |       |                 |
| Comment:                          | Bradenhead access present. |       |                 |
| Corrective Action:                |                            | Date: |                 |
| Type: Deadman # & Marked          | # 4                        |       |                 |
| Comment:                          |                            |       |                 |
| Corrective Action:                |                            | Date: |                 |
| Type: Bird Protectors             | # 1                        |       |                 |
| Comment:                          |                            |       |                 |
| Corrective Action:                |                            | Date: |                 |
| Type: Plunger Lift                | # 1                        |       |                 |

|                                     |     |       |  |
|-------------------------------------|-----|-------|--|
| Comment:                            |     |       |  |
| Corrective Action:                  |     | Date: |  |
| Type: Gas Meter Run                 | # 2 |       |  |
| Comment: <a href="#">Telemetry.</a> |     |       |  |
| Corrective Action:                  |     | Date: |  |

**Tanks and Berms:**

| Contents           | # | Capacity | Type      | Tank ID | SE GPS |
|--------------------|---|----------|-----------|---------|--------|
| PRODUCED WATER     | 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 |
|--------------------|----------|---------------------|---------------------|-------------|
| Metal              |          |                     |                     |             |
| Comment:           |          |                     |                     |             |
| Corrective Action: |          |                     |                     | Date:       |

| Contents           | # | Capacity | Type      | Tank ID | SE GPS |
|--------------------|---|----------|-----------|---------|--------|
| CRUDE OIL          | 1 | 300 BBLs | STEEL AST |         | ,      |
| Comment:           |   |          |           |         |        |
| Corrective Action: |   |          |           |         |        |

**Paint**

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

**Berms**

| Type               | Capacity   | Permeability (Wall) | Permeability (Base) | Maintenance                      |
|--------------------|--|---------------------|---------------------|----------------------------------|
| Metal              |  |                     |                     | Inadequate                       |
| Comment:           | <a href="#">Gaps in metal connections of secondary containment.</a>                            |                     |                     |                                  |
| Corrective Action: | <a href="#">Repair or install berms or other secondary containment devices per Rule 603.o.</a> |                     |                     | Date: <a href="#">05/07/2021</a> |

**Venting:**

|                    |    |       |
|--------------------|----|-------|
| Yes/No             | NO |       |
| Comment:           |    |       |
| Corrective Action: |    | Date: |

**Flaring:**

|      |  |  |
|------|--|--|
| Type |  |  |
|------|--|--|

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

**Inspected Facilities**Facility ID: 257851 Type: WELL API Number: 103-10042 Status: SI Insp. Status: SI**Idle Well**Purpose: ☒ Shut In ☐ Temporarily Abandoned Reminder: \_\_\_\_\_

Comment: Last reported monthly operations were January 2021. Production is missing for July 2020 to September 2020. Most recent reported production June 2020. Report past due monthly operations.

Corrective Action: Submit required Form 7(s) to COGCC per rule 413.b.Date: 05/07/2021Facility ID: 260196 Type: WELL API Number: 103-10137 Status: SI Insp. Status: SI**Idle Well**Purpose: ☒ Shut In ☐ Temporarily Abandoned Reminder: \_\_\_\_\_

Comment: Last reported monthly operations were January 2021. Production is missing for July 2020 to September 2020. Most recent reported produced volumes in October 2003. Last MIT on 1-10-2012.

Corrective Action: Produce well after performing successful mechanical integrity test per Rule 417 or plug well. To maintain shut-in status, the well must be able to demonstrate ability to produce without mechanical intervention.Date: 11/05/2018

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

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Ditches          |                 |                         |                       |               |                          |         |
| Rip Rap          | Fail            |                         |                       |               |                          |         |

Comment: Stormwater channel on edge of location. Existing rip rap is insufficient to prevent the erosion.

Corrective Action: Install, maintain, or provide documentation of post construction management plan or BMP's.

Date: 06/07/2021

Pits: ☒ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 402652258    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5397643">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5397643</a> |
| 701500219    | inspection photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5397633">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5397633</a> |