

**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:

12/07/2022

Submitted Date:

01/13/2023

Document Number:

702700196**FIELD INSPECTION FORM**Loc ID 317497 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 42950Name of Operator: INDUSTRIAL GAS SERVICES INCAddress: 5862 MCINTYRE COURTCity: GOLDEN State: CO Zip: 80403**Status Summary:**

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

Findings:

- 14 Number of Comments
- 12 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
Oxford, Steven	(303) 422-3400	igsinc@att.net	
Lindley, Trent		trent.lindley@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Edwardson, Dylan		dylan.edwardson@state.co.us	
Allison, Rick		rick.allison@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Kraich, Adam		adam.kraich@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
238366	WELL	SI	08/01/2021	GW	123-05210	HENDERSHOT 1	EI
317497	LOCATION	AC			-	HENDERSHOT-66N61W 25SENW	EI

General Comment:

On Wednesday 12/7/2022 an environmental inspection was performed for Hendershot 1 well and location. Operator personnel was not present during time of inspection. Photos attached to document site conditions.

Operator Name: INDUSTRIAL GAS SERVICES INC.
Location Name: HENDERSHOT #1 API: 05-123-05210
Location ID: 317497
Location County: Weld County, Colorado

An NOAV (Doc #402668910) was issued for Hendershot 1 well (API 05-123-05210) on April 23, 2021.
Prior Corrective Action dates remain applicable.

Note:
COGCC records indicate the Hendershot 1 Well (API 05-123-05210) was cut and capped on October 21, 2022.
Facility is located within a High Priority Habitat for Mule Deer Severe Winter Range, Mule Deer Winter Concentration Area and Pronghorn Winter Concentration.

LocationOverall Good: ☐

Signs/Marker:			
Type	WELLHEAD		
Comment:	Wellhead signage is missing.		
Corrective Action:	Install signage to comply with Rule 605.d.	Date:	02/12/2023
Type	TANK LABELS/PLACARDS		
Comment:	Tank NFPA placards and signage are inadequate.		
Corrective Action:	Install signage to comply with Rule 605.h. or install signage to indicate tanks are permanently out of service.	Date:	02/12/2023

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Ongoing issue: While dead some dead weeds have been removed from the pit excavation; Dead weeds were observed at wellhead and throughout tank battery.		
Corrective Action:	Comply with Rule 606.	Date:	05/23/2021
Type	UNUSED EQUIPMENT		
Comment:	Ongoing issue: Unused equipment was observed at wellhead and throughout tank battery.		
Corrective Action:	Comply with Rule 606.	Date:	05/23/2021
Type	DEBRIS		
Comment:	Ongoing issue: Trash and debris observed at wellhead and throughout tank battery.		
Corrective Action:	Comply with Rule 606.	Date:	05/23/2021
Type	OTHER		
Comment:	Ongoing issue: While some stained soils have been removed; stained soils were observed at the wellhead and throughout tank battery both within and outside of secondary containment.		
Corrective Action:	Conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f.(2).D. and properly dispose of oily waste in accordance with 905.e.	Date:	05/23/2021

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Fencing/:			
Type	OTHER		

Comment:	Approximately 20'x10'x10' open excavation at wellhead without any means of excluding entry of people, livestock or wildlife at time of inspection. Operators are responsible for ensuring that operations are conducted with due regard for the safety to protect of employees, for the preservation and conservation of property, and for protecting and minimizing adverse impacts to public health, safety, welfare, the environment, and wildlife resources.		
Corrective Action:	Operators shall comply with Rule 602.c. immediately and will fence or cover the open excavation to prevent access when the site is not attended. The site was not attended at the time of the inspection.	Date:	01/15/2023

Equipment:			corrective date
Type: Vertical Heater Treater	# 1		
Comment:	On October 24, 2017 (document no. 684904638), COGCC Staff performed a routine inspection and observed possible point of wildlife ingress in vertical heater treater. Staff required Operator to prevent wildlife access to the vertical heater treater as a corrective action. On April 5, 2018 (document no. 684905256), April 25, 2019 (document no. 696100828), May 4, 2020 (document no. 696301780), and October 26, 2020 (document no. 696302590), COGCC Staff performed followup inspections and observed corrective actions from previous inspections to prevent wildlife access to the vertical heater treater were not complete.		
Corrective Action:	The corrective action from previous inspections to prevent wildlife access to the vertical heater treater remains incomplete, violating Rule 608.b.(7). Operator shall equip equipment with screens or other appropriate equipment to prevent possible ingress of wildlife into a heated unit, violating Rule 608.b.(7).	Date:	05/23/2021

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
OTHER	2					
Comment:	Operator has disconnected and/or removed piping, manways, valves, fittings and other ancillary equipment from the crude oil aboveground storage tank (AST) and the vertical heater treater and failed to install screens or other appropriate equipment to prevent access (both the public and wildlife) to the interior of the AST/confined space.					
Corrective Action:	Per 609.c. Rules: Operator shall (1) Isolate or disconnect the Tank or process vessel from sources of oil, condensate, produced water, or natural gas; (2) Depressurize and evacuate all hydrocarbons and produced water from the Tank or process vessel and test the interior of the Tank or process vessel to show that it is safe for designated entry, cleaning or repair work. (3) Apply OOSLAT; and (4) Equip any openings in the Tank or process vessel with screens or other appropriate equipment to prevent entry by wildlife, including birds and bats.					Date: 01/26/2023

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth		Walls Insufficient		Inadequate
Comment:	All tank battery earthen secondary containment berms have eroded and animal burrows were observed throughout.			

Corrective Action:	Operator shall rebuild and maintain berms around production tanks to ensure secondary containment per Rule 603.o. Additionally, Operator shall inspect at regular intervals, and maintain in good condition: berms or other secondary containment devices around separators, crude oil, condensate, and produced water tanks (collectively: "ASTs") to provide secondary containment for the largest single tank and sufficient freeboard to contain precipitation.	Date:	05/23/2021
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Wells Served By Facilities Above**AirsID**

API Number
123-05210

API Number	AirsID
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Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>238366</u>	Type:	<u>WELL</u>	API Number:	<u>123-05210</u>	Status:	<u>SI</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>317497</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Operator has submitted a Form 27 Initial Site Investigation and Remediation Workplan (Form 27i Doc #403234303) for pit closure and decommissioning of the following Oil and Gas Facilities: Hendershot 1 Pit (448198) Hendershot 1 Well & associated off-location flowline (API 05-123-05210) HENDERSHOT-66N61W25SENW Tank Battery and associated on-location flowlines (317497) However, upon cursory review COGCC determined the proposed sampling plan to be inadequate. COGCC has returned Doc #403234303 to draft.

Corrective Action: Operator shall submit three individual Form 27 Initials for site investigation and remediation of the above referenced facilities pursuant to Rule 911.a.(4), Rule 913.c. and Rule 911.c. Operator's proposed sampling and site investigation activities shall comply with the Rule 911.A . (4) - Oil and Gas Facility Closure and Rule 911.c. Pit Closure Guidance Documents.

Date: 01/23/2023

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: Stockpiled soil/oily waste was observed at the wellhead with no and/or inadequate BMPs installed.
Stockpiles by well measure approximately 18'x15'x5'
Stockpile to the southeast of the well measured approximately 15'x10'x4'

Corrective Action: Manage stockpiles in compliance with Rule 1002.c.
Manage waste in compliance with Rule 913.b.(3) and COGCC Guidance 913.b.(5)B.i-v.

Date: 01/23/2023

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____

Wildlife Protection Devices (fired vessels): _____

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

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment _____

Corrective Action _____ Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged Pass

Pit mouse/rat holes, cellars backfilled Fail

Debris removed Fail

No disturbance /Location never built _____

Access Roads Regraded Fail

Contoured Fail

Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed Fail

Locations, facilities, roads, recontoured Fail

Compaction alleviation Fail

Dust and erosion control Fail

Non cropland: Revegetated 80% _____

Cropland: perennial forage Fail

Weeds present Fail

Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment:

COGCC records indicate the Hendershot 1 Well (API 05-123-05210) was cut and capped on October 21, 2022. All equipment associated with the well site and associated production facility remain on location and final reclamation has not begun. This location does not comply with Rule 1004. Reclamation rules require reclamation activities to be conducted within three months of plugging on cropland. A followup inspection will be conducted at a later date to document progress and compliance.

Operator shall Comply with Rule 1004 and collaborate with the landowner to allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production.

Corrective Action:

Date

Overall Final Reclamation

In Process

Well Release on Active Location



Multi-Well Location

**Attached Documents**

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

Document Num	Description	URL
702700197	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5983212