

**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:

11/16/2023

Submitted Date:

11/19/2023

Document Number:

710100078

FIELD INSPECTION FORMLoc ID 318924 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10583

Name of Operator: PETRO OPERATING COMPANY LLC

Address: 9033 E EASTER PLACE SUITE 112

City: CENTENNIAL State: CO Zip: 80112-

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

11 Number of Comments

6 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
Peterson, Andy		andy.peterson@iptenergyservices.com	
Farkas, Joel		joelharkas@gmail.com	
Serra, Toni		toni@garnow.com	Principal Agent
MacLaren, Joe		joe.maclaren@state.co.us	
Parker, Roger		rogeraparker9@aol.com	
Parker, Erin		erinbparker9@gmail.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
470203	TANK BATTERY	AC	12/18/2019		-	Counter 1-Ad battery	EI

General Comment:

On November 16, 2023, ECMC Environmental Protection Specialist (Laurel Anderson) conducted a field inspection of Petro Operating Company LLC's Counter 1-AD Tank Battery (Facility ID: 470203) and COUNTER-62N66W 30NWNW (Location ID: 318924).

Field notes, photo documentation and a map are attached to document conditions at the time of inspection.

Any corrective action(s) and corrective action due dates from previous inspections that have not been addressed are still applicable.

Note: this inspection was combined with an ECMC Environmental Inspection in response to a reported spill of oil based drilling mud at the LG Everist Access Road Intersection (CR18 and access road). A separate Field Inspection Report has been submitted for corrective actions regarding the spill under the LG Everist/2N66W30 location (Location ID 484897).

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Adequate

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment stored on location.		
Corrective Action:	Operator shall comply with Rule 606.a.: "The storage, placement, or maintenance of equipment, vehicles, trailers, commercial products, chemicals, drums, totes, containers, materials, and all other supplies not necessary for use on an Oil and Gas Locations is prohibited."	Date:	12/03/2023
Type	TRASH		
Comment:	Trash observed throughout location.		
Corrective Action:	Operator shall comply with Rule 606.d.: "Operators will properly dispose of all trash, rubbish, and other waste materials as non-hazardous/non-E&P solid waste, pursuant to Rule 906.c."	Date:	12/03/2023
Type	WEEDS		
Comment:	Weeds observed on location.		
Corrective Action:	Operator shall comply with ECMC Rule 606.c. and Rule 1003.f. which require Oil and Gas Locations be kept free of all Undesirable Plant Species designated to be noxious weeds as practicable.	Date:	12/03/2023
Type	OTHER		
Comment:	Stained soil observed on location, east of earthen produced water AST and crude oil AST secondary containment berm.		
Corrective Action:	Operator shall comply with Rule 1002.f.(2)D.: "Self-inspection, maintenance, and good housekeeping procedures and schedules to facilitate identification of conditions that could cause breakdowns or failures of BMPs. These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices. In conducting inspections and maintenance relative to stormwater runoff, operators shall consider seasonal factors, such as winter snow cover and spring runoff from snowmelt, to ensure site conditions and controls are adequate and in place to effectively manage stormwater."	Date:	12/03/2023

Overall Good: ☐

Spills:				
Type	Area	Volume		
PW/CO	Truck Loadout	<= 1 bbl		
Comment:	Stained soil observed around the loadout secondary containment spill bucket for the 300-bbl produced water AST.			
Corrective Action:	Properly dispose of oily waste in accordance with 905.e.			Date: 12/03/2023

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Flow Line	#		
Comment:	Out of service flowlines (off- and on- location) and piping were observed on location adjacent to the crude oil and produced water ASTs and former horizontal separator.		

Corrective Action:	Operator shall comply with all applicable ECMC 1100 Series Rules. -Repair all flowlines intended for return to service per Rule 1102.j. -For shut-in or out of service off-location flowlines or crude oil transfer lines, Operator shall comply with Rule 1102.o. -For flowlines being abandoned, Operator shall comply with ECMC Rule 1105 -Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/OOSLAT to prevent unintentional release per Rule 1102.j.7 (at well ASAP/second endpoint/facility prior to and during repair). Provide confirmation documentation of completion (photos) to ECMC Integrity Inspector and Engineer.	Date:	12/19/2023
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Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	300 BBLS	STEEL AST		40.116067,-104.828651
Comment:	Dirt beneath the 300 bbl steel produced water AST has started to erode and undermine the tank.				
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:				
Corrective Action:				Date:

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	470203	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	EI

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Environmental**Spill/Remediation:**

Comment: [The horizontal separator on location has been removed prior to ECMC receipt and approval of a Form 27 Initial Site Investigation and Remediation Workplan for decommissioning.](#)

Corrective
Action:

Date: _____

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
403600778	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328338
710100079	ECMC Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328332
710100080	ECMC Field Notes	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328333
710100087	ECMC Location Figure	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6328334