

**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:

05/13/2024

Submitted Date:

05/14/2024

Document Number:

715500010

FIELD INSPECTION FORMLoc ID 312759 Inspector Name: Burchett, Kirby On-Site Inspection ☐ 2A Doc Num: **Operator Information:**

ECMC Operator Number: 6720

Name of Operator: ROBERT L BAYLESS PRODUCER LLC

Address: 621 17TH ST STE 2300

City: DENVER State: CO Zip: 80293

Status Summary:

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

Findings:

18 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
Thomas, John	(505) 326-2659	jthomas@rlbayless.com	
Trujillo, Helen	(505) 326-2659	htrujillo@rlbayless.com	
Engineering, ECMC		dnr_cogccengineering@state.co.us	
, Inspections	(505) 326-2659	notices@rlbayless.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
222212	WELL	PR	05/01/2023	OW	081-05169	GOV'T-POHLMAN 1	PR

General Comment:

ECMC Inspection Report Summary

On Monday, 05/13/2024, Inspector Kirby Burchett, conducted a follow up field inspection at Robert L Bayless Producer LLC on the Gov't-Pohlman 1 well, Location #312759, in Moffat County, Colorado.

This location is within or in close proximity to Parks and Wildlife (CPW) District and High Priority Habitat area with Density and Other Consultation Habitat regulations.

Any Corrective Actions from previous Inspections are still applicable.

Follow up inspection in response to compliance issues observed during Insp. #702502281 on 1/8/24 and Insp. #702502401 on 2/19/24. The following Corrective Actions are unresolved and original CA due dates will remain:

1. Random debris at oil tank battery.
2. No Facility or Location ID for off-site production facility.
3. Tank battery sign incomplete.

Refer to Inspection Photos for observed compliance issues.

Production facilities are offsite and shared with the Gov't-Pohlman 2 well.

While there during normal operations the following compliance issues were observed:

1. No visible Bradenhead access.
2. Stained soil and old spills at oil tank battery.
3. ECD flaring a large amount of gas. No gas meter in place. Production gas estimated?

Refer to Inspection Photos for observed compliance issues.

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

LocationOverall Good: ☐**Signs/Marker:**

Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Tank battery sign missing required information.		
Corrective Action:	The Tank battery sign will be no less than 3 square feet and no more than 6 square feet, and will provide: Name of the Operator; Telephone number at which the Operator can be reached at all times; Telephone number for local emergency services (911 where available); The public road used to access the Tank battery site; Well name(s) and API number(s) associated with the Tank battery and the legal location of the Well(s); and Location, including the quarter/quarter section, of the Tank battery.	Date:	04/20/2024
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	
Type	CONTAINERS		
Comment:	Replace when damaged or illegible		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location entrance signs on private gate access		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 505-327-0880 or 911

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	Random debris still remaining at Crude Oil tank battery		
Corrective Action:	All excess materials, rubbish, supplies, trash, or other waste material will be properly contained until removed from the Oil and Gas Location. At no time will debris be placed or remain on the ground.	Date:	02/27/2024

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	Tank	<= 1 bbl		
Comment:	Oily waste from current and older spills.			
Corrective Action:	Remove and properly dispose of oily waste and impacted soil.	Date:	05/29/2024	

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Fencing/:			
Type	IGNITOR/COMBUSTOR		
Comment:	Cattle panels		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Cattle panels		
Corrective Action:		Date:	
Type	TANK BATTERY		
Comment:	Production tank. Cattle panels		
Corrective Action:		Date:	
Type	PUMP JACK		
Comment:	Manufacturers		
Corrective Action:		Date:	
Equipment:			corrective date
Type: Deadman # & Marked	# 4		
Comment:			
Corrective Action:		Date:	
Type: Ancillary equipment	# 1		
Comment:	Chemical tank in containment		
Corrective Action:		Date:	
Type: Bird Protectors	# 2		
Comment:			
Corrective Action:		Date:	
Type: Pump Jack	# 1		
Comment:			
Corrective Action:		Date:	
Type: Bradenhead	# 0		
Comment:	Bradenhead inaccessible or not visible. Intermediate and Surface valves need to be brought to surface and identified.		
Corrective Action:	Install appropriate fittings to allow Bradenhead visual inspection.		Date: 05/24/2024
Type: Emission Control Device	# 1		
Comment:	ECD appears to be burning a large amount of gas. No metering of gas volume. Volumes are estimates in Production Reporting? No Gas Capture Plan in website documents. Venting and Flaring of natural gas represent waste of an important energy resource and pose safety and environmental risks. Venting and Flaring, except as specifically allowed, are prohibited.		
Corrective Action:	Engineering approval is required to flare gas directly from the Gov't-Pohlman 1 and Gov't-Pohlman 2 wells to offsite tank battery.		Date: 06/14/2024
Type: Vertical Heater Treater	# 1		
Comment:			

Corrective Action:		Date:	
Type: Prime Mover	# 2		
Comment:			
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	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	Adequate			
Comment:	Lined			
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	2	500 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	Adequate			
Comment:	Unlined			
Corrective Action:				Date:

Venting:

Yes/No	NO	
Comment:		
Corrective Action:	Date:	

Flaring:

Type	
Comment:	

Corrective Action:		Date:	
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Inspected Facilities									
Facility ID:	222212	Type:	WELL	API Number:	081-05169	Status:	PR	Insp. Status:	PR
Producing Well									
Comment:	March 2024 Production Report Tank battery is offsite from Gov't-Pohlman 1 and 2 wells. Offsite tank battery needs to be identified with a facility and location ID.								
Corrective Action:	Submit proper paperwork to designate tank battery as a separate facility and location.							Date:	06/14/2024
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment:		Operator is responsible for maintaining Best Management Practices (BMPs) to control vehicle tracking and potential sediment discharges from operational roads, well pads, and other unpaved surfaces.				
Corrective Action:						Date: _____
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
403790638	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6547782
715500011	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6547780