

**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:

06/05/2024

Submitted Date:

06/05/2024

Document Number:

715500171

FIELD INSPECTION FORMLoc ID 312960 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:**

13 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
, Inspections	(505) 326-2659	notices@rlbayless.com	
Trujillo, Helen	(505) 326-2659	htrujillo@rlbayless.com	
Wilson, Justin	(970) 878-3825	jrwilson@blm.gov	
Thomas, John	(505) 326-2659	jthomas@rlbayless.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
223036	WELL	SI	12/01/2023	GW	081-06398	COTTONWOOD GULCH FEDERAL C-1	SI

General Comment:**ECMC Inspection Report Summary**

On Wednesday, 06/05/2024, Inspector Kirby Burchett, conducted a routine field inspection at Robert L Bayless Producer LLC on the Cottonwood Gulch Federal C-1 well, Location #312960, in Moffat County, Colorado.

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

Any Corrective Actions from previous Inspections are still applicable.

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

1. Containment open to wildlife.
2. Open end tank valve.
3. Tank berm insufficient.
4. No tank battery sign.
5. Debris.
6. Relief riser missing cap.

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	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	
Type	CONTAINERS		
Comment:	Operators will ensure that container and tank labels are well maintained and legible, and will replace damaged or vandalized labels within 10 days of discovery that the label is no longer legible or is damaged.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Sign not displayed		
Corrective Action:	Operators will ensure that signs are well maintained and legible, and will replace damaged or vandalized signs within 30 days of discovery that the sign is no longer legible or is damaged.	Date:	07/06/2024
Type	OTHER		
Comment:	Separator units include attached storage tanks. No form of labeling or markers are present to identify a potential hazard or the contents of the storage tank.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 505-327-0880 or 911

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	Random debris		
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:	06/13/2024

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Fencing/:**

Type	LOCATION		
Comment:	Livestock and barbed wire		
Corrective Action:		Date:	

Equipment:			corrective date
Type: Deadman # & Marked	# 1		
Comment:			
Corrective Action:			Date:
Type: Bradenhead	# 1		
Comment:			
Corrective Action:			Date:
Type: Plunger Lift	# 1		
Comment:			
Corrective Action:			Date:
Type: Bird Protectors	# 1		
Comment:			
Corrective Action:			Date:
Type: Horizontal Heated Separator	# 1		
Comment:	Relief riser missing protective cap		
Corrective Action:	Vents on pressure safety devices will terminate in a manner so as not to endanger the public or adjoining facilities. They will be designed to be clear and free of debris and water at all times.		Date: 06/21/2024
Type: Ancillary equipment	# 1		
Comment:	Methanol tank on containment. Containment open to wildlife.		
Corrective Action:	Install wildlife protection equipment.		Date: 06/16/2024
Type: Gas Meter Run	# 1		
Comment:			
Corrective Action:			Date:

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	OTHER	STEEL AST		,
Comment:	Open end load line.				
Corrective Action:	All load lines or tank valves that can be used as a load line will be capped or plugged.				Date: 06/11/2024

Paint

Condition	
Other (Content)	
Other (Capacity) 210	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient		Inadequate

Comment:	28' x 32' rounded berm. Secondary containment is inadequate to contain 150% of the volume of the largest tank. Secondary containment is not sufficiently impervious to contain spilled or released materials.	
Corrective Action:	Repair or install berms or other secondary containment devices.	Date: 06/26/2024

Venting:			
Yes/No	NO		
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	223036	Type:	WELL	API Number:	081-06398	Status:	SI	Insp. Status:	SI
Idle Well									
Purpose: <input checked="" type="checkbox"/> Shut In <input type="checkbox"/> Temporarily Abandoned Reminder: _____									
Comment: <div>Shut in - December 2023 March 2024 Production Report</div>									
Corrective Action: _____ Date: _____									

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
715500172	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6575621