

**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:

07/30/2024

Submitted Date:

07/30/2024

Document Number:

715500477

**FIELD INSPECTION FORM**

Loc ID: 316271  
Inspector Name: Burchett, Kirby  
On-Site Inspection:   
2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

ECMC Operator Number: 10775  
Name of Operator: KT RESOURCES LLC  
Address: 3381 WESTBROOK LANE  
City: HIGHLANDS State: CO Zip: 80129

**Findings:**

- 15 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 |
|-------------------|----------------|----------------------------------|---------|
| Adams, Karen      | (303) 886-8733 | adams@kt-res.com                 |         |
| Wilson, Justin    | (970) 878-3825 | jrwilson@blm.gov                 |         |
| Gale, Tony        | (303) 886-8733 | tony@kt-res.com                  |         |
| Enforcement, ECMC |                | dnr_cogccenforcement@state.co.us |         |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 260089      | WELL | SI     | 03/01/2024  | GW         | 103-10132 | WRD DOW 20-11 | SI          |

**General Comment:**

[ECMC Inspection Report Summary](#)

On Tuesday, 07/30/2024, Inspector Kirby Burchett, conducted a follow up field inspection at KT Resources LLC on the WRD Dow 20-11 well, Location #316271, in Rio Blanco County, Colorado.

This location is within or in close proximity to a Parks and Wildlife (CPW) District and Black Bear area with High Priority, NSO, 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. #715500373 on 7/9/24 including 3 previous inspections since 6/14/23. The following Corrective Actions have not been resolved and original due dates remain:

1. Leaking equipment and stained soils.
2. Gas meter calibration out of compliance.
3. Weeds.

Refer to Inspection Photos for observed compliance issues.

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

1. Illegible label.

Refer to Inspection Photo for observed compliance issue.

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

**Location**

Overall Good:

| <b>Signs/Marker:</b> |  |       |            |
|----------------------|--|-------|------------|
| 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: |            |
| Type                 | WELLHEAD   |       |            |
| Comment:             | As Wellhead signs are replaced: The Well name; The API Number; and Its legal location, including the quarter/quarter section will be required.   |       |            |
| Corrective Action:   |  | Date: |            |
| Type                 | TANK LABELS/PLACARDS   |       |            |
| Comment:             |  |       |            |
| Corrective Action:   |  | Date: |            |
| Type                 | BATTERY  |       |            |
| Comment:             |  |       |            |
| Corrective Action:   |  | Date: |            |
| Type                 | OTHER  |       |            |
| Comment:             | As Location Entrance signs are replaced: The Well name; The Commission's Location identification number (ID #); The Operator's telephone number where it may be reached at all times; and the Telephone number(s) for local emergency services (911 where available) will be required. |       |            |
| Corrective Action:   |  | Date: |            |
| Type                 | CONTAINERS   |       |            |
| Comment:             | Label faded and illegible  |       |            |
| Corrective Action:   | 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.   | Date: | 08/10/2024 |

|                                  |                       |       |  |
|----------------------------------|-----------------------|-------|--|
| <b>Emergency Contact Number:</b> |                       |       |  |
| Comment:                         | (800) 288-0560 or 911 |       |  |
| Corrective Action:               |                       | Date: |  |

| <b>Good Housekeeping:</b> |  |       |            |
|---------------------------|--|-------|------------|
| Type                      | WEEDS  |       |            |
| Comment:                  | Oil and Gas Locations will be kept free of all Undesirable Plant Species.  |       |            |
| Corrective Action:        | Maintain noxious weed control on all disturbed and reclaimed areas as a result of Oil & Gas activities including access roads. | Date: | 07/17/2024 |

Overall Good:

| <b>Spills:</b>     |   |          |                  |
|--------------------|---|----------|------------------|
| Type               | Area  | Volume   |                  |
| Crude Oil          | Tank  | <= 1 bbl |                  |
| Comment:           | Access cover leaking on crude oil tank.   |          |                  |
| Corrective Action: | Repair equipment. Remove and properly dispose of oily waste and impacted soils. |          | Date: 06/10/2024 |
| Crude Oil          | Truck Loadout   | <= 1 bbl |                  |

|  |                                  |  |
|--|----------------------------------|--|
| Comment: <a href="#">Stained soil under loadout pot.</a>   |                                  |  |
| Corrective Action: <a href="#">Remove and properly dispose of oily waste and impacted soils.</a> | Date: <a href="#">07/04/2024</a> |  |

In Containment: Yes

Comment:

Multiple Spills and Releases?

| <b>Equipment:</b>   |                                  | corrective date |
|---|----------------------------------|-----------------|
| Type: Ancillary equipment   | # 1                              |                 |
| Comment: <a href="#">Chemical tank on containment</a>   |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Horizontal Heated Separator   | # 1                              |                 |
| Comment:  |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Deadman # & Marked  | # 4                              |                 |
| Comment:  |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Plunger Lift  | # 1                              |                 |
| Comment:  |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Bradenhead  | # 1                              |                 |
| Comment:  |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Bird Protectors   | # 2                              |                 |
| Comment:  |                                  |                 |
| Corrective Action:  |                                  | Date:           |
| Type: Gas Meter Run   | # 1                              |                 |
| Comment: <a href="#">Gas meter calibration out of compliance.</a>   |                                  |                 |
| Corrective Action: <a href="#">Meters will be calibrated annually unless more frequent calibration is required by contractual obligations or by the Director.</a> | Date: <a href="#">01/28/2024</a> |                 |

**Tanks and Berms:**

| Contents           | # | Capacity | Type             | Tank ID | SE GPS |
|--------------------|---|----------|------------------|---------|--------|
| CRUDE OIL          | 1 | 300 BBLs | HEATED 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: <a href="#">Unlined</a> |          |                     |                     |             |        |
| Corrective Action:               |          |                     |                     | Date:       |        |
| Contents                         | #        | Capacity            | Type                | Tank ID     | SE GPS |
| PRODUCED WATER                   | 1        | 300 BBLs            | STEEL AST           |             |        |
| Comment:                         |          |                     |                     |             |        |
| Corrective Action:               |          |                     |                     | Date:       |        |
| <b>Paint</b>                     |          |                     |                     |             |        |
| Condition                        | Adequate |                     |                     |             |        |
| Other (Content)                  |          |                     |                     |             |        |
| Other (Capacity)                 |          |                     |                     |             |        |
| Other (Type)                     |          |                     |                     |             |        |
| <b>Berms</b>                     |          |                     |                     |             |        |
| Type                             | Capacity | Permeability (Wall) | Permeability (Base) | Maintenance |        |
| Metal                            | Adequate |                     |                     |             |        |
| Comment: <a href="#">Unlined</a> |          |                     |                     |             |        |
| Corrective Action:               |          |                     |                     | Date:       |        |
| <b>Venting:</b>                  |          |                     |                     |             |        |
| Yes/No                           | NO       |                     |                     |             |        |
| Comment:                         |          |                     |                     |             |        |
| Corrective Action:               |          |                     |                     |             | Date:  |
| <b>Flaring:</b>                  |          |                     |                     |             |        |
| Type                             |          |                     |                     |             |        |
| Comment:                         |          |                     |                     |             |        |
| Corrective Action:               |          |                     |                     |             | Date:  |

**Inspected Facilities**

Facility ID: 260089 Type: WELL API Number: 103-10132 Status: SI Insp. Status: SI

**Idle Well**

Purpose:  Shut In  Temporarily Abandoned Reminder: \_\_\_\_\_

Comment:

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 |
|------------------|-----------------|-------------------------|-----------------------|--|--------------------------|---------|
| Ditches          |                 |                         |                       |  |                          |         |
|                  |                 |                         |                       | Material Handling And Spill Prevention |                          |         |
|                  |                 | Ditches                 |                       |  |                          |         |

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:**     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   |
|--------------|----------------------|---|
| 403871587    | INSPECTION SUBMITTED | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6645690">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6645690</a> |
| 715500479    | Inspection Photos    | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6645683">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6645683</a> |