

**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:

10/03/2024

Submitted Date:

10/04/2024

Document Number:

713601486**FIELD INSPECTION FORM**Loc ID 324831 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC Operator Number: 83130Name of Operator: STRACHAN EXPLORATION INCAddress: 992 S 4TH AVE SUITE 100-461City: BRIGHTON State: CO Zip: 80601**Status Summary:**

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

Findings:10 Number of Comments7 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
BEAR STACY		stacy@strachanexploration.com	
Harms, Jason		Jason@strachanexploration.com	
Sanchez, Chris		chris.sanchez@state.co.us	
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
213004	WELL	PR	06/01/2022	OW	061-06365	FRAZEE 2-6	RI

General Comment:

This is a follow up of the previous inspections #690204389, #713600144, #713600432, #713600781.
The corrective actions of the previous inspections have not been completed.
See attached photos and additional details within this report.

Operator is directed to perform corrective actions outlined on this inspection report immediately.

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

Type	WELLHEAD		
Comment:	New well sign has been installed.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date:	
Corrective Action:			

Good Housekeeping:

Type	OTHER		
Comment:	There is a broken plastic tank next to the pump jack that must be removed and properly disposed.		
Corrective Action:	Comply with Rule 606.	Date:	10/18/2024

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	Tank			
Comment:	There was a previous spill that occurred at the tank battery and soils were pushed up and spread over the spilled area. There was an unknown amount spilled due to grading of this area. Additionally impacted soils were spread across the location and were also used to rebuild the earthen berms. There are still oily impacted soils along the road and mixed in with the earthen berms. There is also oil saturated soils at the base of the tank which has not been cleaned up. All impacted material must be removed and properly disposed. A form 19 spill report was submitted since the previous inspection but it does not appear any cleanup has been performed. Previous CA was not completed. Corrective action must be completed immediately.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.			Date: 11/29/2023

In Containment: No

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

Type			
Comment:	The fencing around the equipment is inadequate to prevent livestock entry. The 2 wire fence has loose wires and is low to the ground and livestock can easy enter into the production equipment. Previous CA was not completed.		
Corrective Action:	Comply with the fencing requirements per the 1002a rules		
		Date:	03/15/2024

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
	1	200 BBLS	STEEL AST		38.439260,-103.059543	
Comment:						
Corrective Action:						Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate			Adequate	
Comment:	The tank at the northwest side of the location has a rebuilt earthen berm for secondary containment.				
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		38.438982,-103.059450
Comment:	The berms around the crude oil tank have been rebuilt with impacted material which must be removed and reconstructed. There will need to be additional excavation and sampling at the tank which may constitute a significant modification to the tank. The tank may need to be installed with liner and steel containment per rule 603.o. Corrective action will remain out of compliance until completed.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o. and 902.b.			Date:	11/29/2023

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:					
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
	2		STEEL AST		38.438982,-103.059450
Comment:	There are two large volume tanks with no labeling and no secondary containment. Previous corrective action was not completed. If the tanks are not in use then unused equipment needs to be removed per Rule 606. Previous corrective action was not completed.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.			Date:	06/29/2023

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:	

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Environmental				
Waste Management:				
Type	Management	Condition	GPS (Lat) (Long)	
Oily Soil		Inadequate	38.439167	-103.059903
Comment	There is freshly spread dirt that contains impacted oily soils which has been spread all the way from the tank battery to the roadway. The berms at the tank battery contain oily impacted soils. E&P Waste are not properly stored, handled, transported, treated, recycled, or disposed per Rule 905.			
Corrective Action	Properly dispose of oily waste in accordance with Rule 905.e			Date: 03/01/2024
Spill/Remediation:				
Comment:				
Corrective Action:				Date:
Emission Control Burner (ECB):				
Comment:				
Pilot:	Wildlife Protection Devices (fired vessels):			

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
				Spill Response	Fail	

Comment: There are still oily impacted soils by the pumpjack engine. There are also oil stained soils that remain along the road and berms of the tanks, which is a stormwater issue that could transport impacts offsite.

Corrective Action: Conduct maintenance on equipment, cleanup stained material and review self inspection processes. Comply with 1002.(2).D

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
713601487	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6733493