

**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:

11/15/2024

Submitted Date:

12/09/2024

Document Number:

710100308

FIELD INSPECTION FORM

Loc ID 318870 Inspector Name: Anderson, Laurel 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: 10542
Name of Operator: CUB CREEK ENERGY LLC
Address: 200 PLAZA DRIVE SUITE 100
City: HIGHLANDS State: CO Zip: 80129

Findings:

- 13 Number of Comments
- 10 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
Brown, Kari		kari.oakman@state.co.us	
Combs, Christian		christian.combs@1876resources.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
318870	LOCATION	AC			-	Haley Pad	EI
485972	SPILL OR RELEASE	AC	12/03/2024		-	Haley 3HZ	EI

General Comment:

ECMC environmental inspection to determine progress on Spill ID 485972/Remediation 37489.

Any corrective actions from previous inspections, forms, or orders that have not been addressed are still applicable. Operator and contract environmental personnel were on location at the time of this field inspection. Photos attached to document site conditions.

Incident information: Per Form 19: "On 12/31/2023 at roughly 6pm an Ignitor Tube (Separator) released 2 bbls of oil and 13 bbls of water due to failure caused by corrosion. Release was within bermed containment. 15 bbls were hydro -vaced up. The vessel was isolated, ignition sources were shut off, and all fluids were recovered via hydrovac. Any soil removed during hydrovac operations will be replaced with clean roadbase." Spill ID 485972 remains open past 90 days.

Spill Discovery Date: 12/31/2023

Days since spill discovery: 344 days (as of 12/9/2024)

Last report:

Form 19s received 11/14/2024

Form 27i received 10/4/2024

Current site status:

Spill ID 485972:

-Stained soil visible beneath separator skid. Spill occurred within unlined secondary containment dike. PID readings remain elevated along southern extent of the excavation (see field notes). Operator personnel indicated further excavation (hand digging) would take place the same day followed by additional confirmation soil sampling. SS02@~2' is to be over excavated.

Location ID 318870:

Good Housekeeping issues:

-Leaky equipment, manway bolts on produced water ASTs are beginning to rust

-stained soil and stained secondary containment

-sheen/free product on water within crude oil/PW AST secondary containment (dike with liner)

-unused equipment stored on location (pressure control valve, valve hand wheel, coupling, misc. parts, heat blanket/shielding, etc.)

-trash (minor amounts)

-weeds (along fencing)

Stormwater issues:

-BMPs around location require maintenance/replacement.

-Sediment appears to have discharged off-location along the southern portion of the pad

Signage:

-The majority of signage on location has been updated to reflect the Operator name change; however, some signage still references Cub Creek.

-Some signage is faded/peeling and needs replaced

Spills:

-Significant staining around and within 5 bbl condensate tank and associated corrugated steel secondary containment dike

-Staining at compressor skids

-Staining and free product observed in AST (PW/crude oil) lined secondary containment dike (some pea gravel and precipitation appears to have been removed prior to ECMC inspection).

Location			
Overall Good: <input checked="" type="checkbox"/>			
Signs/Marker:			
Type	OTHER		
Comment:	<p>The majority of signage on location has been updated to reflect the Operator name change (from Cub Creek to 1876 Resources); however, some signage still references Cub Creek.</p> <p>Some equipment placards/signage is faded/peeling and needs replaced. See attached photo documentation.</p>		
Corrective Action:	Install signage to comply with Rule 605.		Date: <u>02/07/2025</u>
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
Good Housekeeping:			
Type	DEBRIS		
Comment:	Trash/debris/oil soaked rags.		
Corrective Action:	Comply with Rule 606.		Date: <u>12/16/2024</u>
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment stored on location (pressure control valve, valve hand wheel, coupling, misc. parts, heat blanket/shielding, etc.).		
Corrective Action:	Comply wiith Rule 606.		Date: <u>12/23/2024</u>
Type	OTHER		
Comment:	Stained soil from leaky equipment identified at various locations through out location.		
Corrective Action:	Comply with ECMC Rule 1002.F.(2).D. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.		Date: <u>12/16/2024</u>
Type	WEEDS		
Comment:	Noxious weeds including species observed in and around any disturbance or spread onto adjacent lands associated with oil and gas activities.		
Corrective Action:	Comply with Rules 606.c. and 1003.f.		Date: <u>12/23/2024</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Condensate	Tank		
Comment:	Stained soil observed within and 5 bbl condensate tank secondary containment dike.		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. (Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR). Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.		Date: <u>12/09/2024</u>
Crude Oil	Tank		
Comment:	Stained soil observed within and outside 5 bbl crude oil tank secondary containment dike.		

Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. (Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR). Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.	Date:	12/09/2024
Other			
Comment:	Stained soil observed around base of compressor skids.		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. (Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR). Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.	Date:	12/09/2024
PW/CO			
Comment:	Free product and stained pea gravel/secondary containment at crude oil/produced water ASTs.		
Corrective Action:	Operator shall immediately control and contain spills/releases and clean up per Rule 912.a. (Note: for any spills that do not meet the reporting requirements of Rule 912.b.; Operator shall provide documentation of the cleanup efforts to the Director per Rule 912.a.(5) - Operator may submit documentation via FIRR). Additionally, Operator shall properly handle, transport and dispose of E&P waste in accordance with 905 Series Rules.	Date:	12/09/2024

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 318870 Type: LOCATION API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 485972 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____
Comment:
Corrective Action: Date: _____
Reportable: _____ GPS: Lat _____ Long _____
Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Waddles	Fail					

Comment: [BMPs around location require maintenance/replacement.](#)
[Sediment appears to have discharged off-location along the southern portion of the pad.](#)

Corrective Action: [Install or repair required BMPs per Rule 1002.f.\(2\)C](#)

Date: 12/24/2024

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
710100309	ECMC Field Notes	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6817480
710100310	Photo Documentation	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6817481