

**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:

01/28/2025

Submitted Date:

01/29/2025

Document Number:

715501201**FIELD INSPECTION FORM**Loc ID 312891 Inspector Name: Burchett, Kirby On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 56680Name of Operator: MERRION OIL & GAS CORPAddress: 610 REILLY AVENUECity: FARMINGTON State: NM Zip: 87401**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**24 Number of Comments13 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
Thompson, Philana	(505) 324-5300	pthompson@merrion.bz	
Haverkamp, Curtis	(720) 786-5560	curtis.haverkamp@state.co.us	<a href="#">Moffat Engineering</a>
Engineering, ECMC		dnr_cogccengineering@state.co.us	
Wilson, Justin	(970) 878-3825	jrwilson@blm.gov	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
222772	WELL	PR	02/01/2021	OW	081-06132	NIGHTINGALE- GOVERNMENT B-1	PR

**General Comment:**[ECMC Inspection Report Summary](#)

On Tuesday, 01/28/2025, Inspector Kirby Burchett, conducted a routine audit and field inspection at Merrion Oil & Gas Corp on the Nightingale-Government B-1 well, Location #312891, in Moffat County, Colorado.

This location is within or in close proximity to a Colorado 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. Debris
2. Unlabeled containers
3. Damaged tank label
4. No sign at tank battery
5. Containments open to wildlife
6. Multiple areas of oily waste and stained soil
7. Open end load line
8. Unprotected vent riser
9. Tank backpressure valve damaged
10. Gas flaring through ECD

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.

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
Type	TANK LABELS/PLACARDS		
Comment:	Damaged and illegible labels		
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: 02/08/2025
Type	CONTAINERS		
Comment:	Unlabeled containers		
Corrective Action:	Containers that are used to store, treat, or otherwise handle a hazardous material and which are required to be marked, placarded, or labeled in accordance with the U.S. Department of Transportation's Hazardous Materials Regulations, will retain the markings, placards, and labels on the Container. Such markings, placards, and labels will be retained on the Container until it is sufficiently cleaned of residue and purged of vapors to remove any potential hazards.		Date: 02/08/2025
Type	BATTERY		
Comment:	No sign at tank battery		
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: 02/28/2025
Type	WELLHEAD		
Comment:			
Corrective Action:			Date:

Emergency Contact Number:

Comment: 505-324-5300

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	OTHER		
Comment:	Containments lacking wildlife protection		
Corrective Action:	Install wildlife protection equipment.		Date: 02/08/2025
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: 02/05/2025

Overall Good: ☐

<b>Spills:</b>			
Type	Area	Volume	
Crude Oil	WELLHEAD		
Comment:	Oily waste and stained soil		
Corrective Action:	Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility.		Date: 02/13/2025
Crude Oil	Tank		

Comment:	Oily waste and stained soil inside tank berm				
Corrective Action:	Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility.			Date:	02/13/2025
Lube Oil	Pump Jack				
Comment:	Oily waste and staining on all sides of pumping unit engine				
Corrective Action:	Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility.			Date:	02/13/2025
PW/CO	Treater				
Comment:	Stained soil at treater drain valve				
Corrective Action:	Remove and properly dispose of any oily waste, stained and contaminated soil to an approved facility.			Date:	02/13/2025

In Containment: No

Comment:

☐ Multiple Spills and Releases?

<b>Equipment:</b>				corrective date
Type: VRT	# 1			
Comment:				
Corrective Action:				Date:
Type: Emission Control Device	# 1			
Comment:	Production records show all gas as being used. ECD flaring a large volume of gas. 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 in this Rule 903, are prohibited.			
Corrective Action:	Verify with area engineer if volume is acceptable. A Gas Capture Plan may be required.			Date: 02/28/2025
Type: Pump Jack	# 1			
Comment:				
Corrective Action:				Date:
Type: Ancillary equipment	# 2			
Comment:	Unlabeled containers on stands inside unprotected containments			
Corrective Action:				Date:
Type: Deadman # & Marked	# 2			
Comment:				
Corrective Action:				Date:
Type: Bird Protectors	# 4			
Comment:				
Corrective Action:				Date:
Type: Prime Mover	# 1			
Comment:	Recirculating pump inside tank berm			
Corrective Action:				Date:
Type: Horizontal Heater Treater	# 1			
Comment:	Unprotected relief vent riser			
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: 02/13/2025

Type: Bradenhead	# 1	
Comment:		
Corrective Action:		Date:

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	OTHER	HEATED STEEL AST		,
Comment:	Backpressure vent on top of tank damaged. Appears swage nipple on top of tank may also be damaged.				
Corrective Action:	Repair damaged equipment				Date: 02/03/2025

**Paint**

Condition	
Other (Content)	
Other (Capacity)	277
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate			
Comment:	Unlined			
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	OTHER	HEATED 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: 02/03/2025

**Paint**

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

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate			
Comment:	Unlined			
Corrective Action:				Date:

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	HEATED STEEL AST		,
Comment:					
Corrective Action:					Date:

**Paint**

Condition	
Other (Content)	

Other (Capacity)					
Other (Type)					
<b>Berms</b>					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Adequate				
Comment: <a href="#">Unlined</a>					
Corrective Action:					Date:
<b>Venting:</b>					
Yes/No					
Comment:					
Corrective Action:					Date:
<b>Flaring:</b>					
Type	Ignitor/Combustor				
Comment:	<a href="#">Large volume of gas being flared. Production records indicate all gas is being used. Engineering to determine if a Gas Capture Plan is required.</a>				
Corrective Action:					Date:

Inspected Facilities									
Facility ID:	222772	Type:	WELL	API Number:	081-06132	Status:	PR	Insp. Status:	PR
Producing Well									
Comment:	November 2024 Production Reported								
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:		Limited Stormwater inspection due to snow cover. 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
715501202	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895322">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895322</a>
715501204	ECD Video	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895323">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895323</a>