

FORM INSP
Rev 05/11

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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Inspection Date:
10/30/2014

Document Number:
673501821

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>437077</u>	<u>334549</u>	<u>COSTA, RYAN</u>	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	<u>66561</u>
Name of Operator:	<u>OXY USA INC</u>
Address:	<u>PO BOX 27757</u>
City:	<u>HOUSTON TX</u> Zip: <u>77227</u>

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED
- INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Proulx, Joan	(970) 263-3641	joan_proulx@oxy.com	All Inspections
Montgomery, Kelley		Kelley_Montgomery@oxy.com	
Sonnier, Brent	(713) 366-3640/ (303) 885-2786	Brent_Sonnier@oxy.com	All Inspections Southeast

Compliance Summary:

QtrQtr:	<u>SENV</u>	Sec:	<u>15</u>	Twp:	<u>27S</u>	Range:	<u>70W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/27/2014	668002524	XX	ND	SATISFACTORY			No

Inspector Comment:

RECLAMATION/STORMWATER INSPECTION

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
211824	WELL	SI	11/18/2013	GW	055-06061	SHEEP MOUNTAIN UNIT 1-15-C	SI <input type="checkbox"/>
211825	WELL	PR	07/12/1982	GW	055-06062	SHEEP MOUNTAIN UNIT 2-10-0	PR <input checked="" type="checkbox"/>
211827	WELL	SI	11/18/2013	GW	055-06064	SHEEP MOUNTAIN UNIT 3-15-B	SI <input type="checkbox"/>
437077	WELL	XX	05/06/2014		055-06315	Sheep Mountain Unit 7-15-I	XX <input checked="" type="checkbox"/>

Equipment:

Location Inventory

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Inspector Name: COSTA, RYAN

Special Purpose Pits: _____	Drilling Pits: _____	Wells: <u>5</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

Location

Lease Road:

Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY			

Emergency Contact Number (S/A/V): _____ Corrective Date: _____

Comment: _____

Corrective Action: _____

Good Housekeeping:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
DEBRIS	ACTION REQUIRED	Wood debris/lumber remains on location. SEE ATTACHED PHOTO #11	Remove wood lumber debris.	12/15/2014

Spills:

Type	Area	Volume	Corrective action	CA Date
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Multiple Spills and Releases?

Fencing/:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
OTHER	ACTION REQUIRED	Cattle guard to the location is damaged. SEE ATTTACHED PHOTO #12	Repair damaged cattle guard.	12/01/2014

Venting:

Yes/No	Comment

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 437077

Site Preparation:

Lease Road Adeq.: SATISFACTORY Pads: SATISFACTORY Soil Stockpile: _____

S/A/V: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:

S/AV: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

BMP Type	Comment
Wildlife	<p>OXY USA WTP LP and OXY USA Inc.</p> <p>Sensitive Wildlife Habitat: Elk Production Area and Bighorn Sheep</p> <ul style="list-style-type: none"> • Consult with CPW to identify locations of elk production areas and bighorn sheep production areas. Map all seasonal habitats using CPW habitat selection models as they become available. • After drilling and completions activities reduce visits to well-sites through remote monitoring (i.e. SCADA) and the use of multi-function contractors. • Schedule, as best as possible, well site visitations to portions of the day between 8:00 a.m. and 3:00 p.m. between November 1 through April 15 in Bighorn Sheep areas. • Schedule, as best as possible, well site visitations to portions of the day between 8:00 a.m. and 3:00 p.m. between May 15 through June 30 in elk production areas. • Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads. • Implement the species appropriate Infrastructure Layout and Drilling and Production Operations Wildlife Protection Measures found in Section II D. of the CPW Wildlife BMP document as follows: • Section II D. DRILLING AND PRODUCTION OPERATIONS WILDLIFE PROTECTION MEASURES: The purpose of these measures is to reduce disturbance on the actual drill site and the surrounding area, to reduce direct conflict with wildlife and hunters, and to prevent wildlife access to equipment. <ol style="list-style-type: none"> 1. Use centralized hydraulic fracturing operations. 2. Where possible, transport water through centralized pipeline systems rather than by trucking. 3. Where possible, locate pipeline systems under existing roadways, or roadways that are planned for development. 4. Maximize use of state-of-the-art drilling technology (e.g., high efficiency rigs, coiled-tubing unit rigs, closed-loop or pitless drilling, etc.) to minimize disturbance. 5. Conduct well completions with drilling operations to limit the number of rig moves and traffic. 6. Install exclusionary devices to prevent bird and other wildlife access to equipment stacks, vents and openings. • Minimize surface disturbance and fragmentation of elk and bighorn sheep habitat through use of the smallest facility footprints possible, use of multiple well pads, clustering of roads and pipelines, and the widest possible spacing of surface facilities. • Remove all unnecessary infrastructure. • Treat waste water pits and any associated pit containing water that provides a suitable medium for breeding mosquitoes with Bti (<i>Bacillus thuringiensis v. israelensis</i>) or take other effective action to control mosquito larvae that may spread West Nile Virus to wildlife, especially grouse. • In order to prevent wildlife from accessing the temporary drilling pits, pits will be contained by a 4-foot high fence. Further, while the pit is not in use, flagging will be placed over the pit to prevent birds from entering the pit. • Implement the species appropriate reclamation guidelines found in Section II G. of the CPW Wildlife BMP document. • Section II G. RESTORATION, RECLAMATION AND ABANDONMENT: The purpose of these measures is to restore disturbed sites to their pre-development conditions, using native vegetation that can be used by the indigenous wildlife. Develop a reclamation plan in consultation with CPW, NRCS, and the land owner or land management agency that incorporates wildlife species-specific goals and that defines reclamation performance standards, including the following components: <ol style="list-style-type: none"> 1. Seed <ol style="list-style-type: none"> a. Use only certified weed-free native seed in seed mixes, unless use of non-native plant materials is recommended by CPW. b. Use locally adapted seed whenever available, especially for species which have wide geographic ranges and much genetic variation (e.g., big sagebrush (<i>Artemisia tridentata</i>), antelope bitterbrush (<i>Purshia tridentata</i>), etc.). c. Where more than one ecotype of a given species is available and potentially adapted to the site, include more than one ecotype per species in the seed mix. d. Use appropriately diverse reclamation seed mixes that mirror an appropriate reference area for the site being reclaimed (see also species-specific recommendations). e. Conduct seeding in a manner that ensures that seedbed preparation and planting techniques

are targeted toward the varied needs of grasses, forbs and shrubs (e.g., seed forbs and shrubs separately from grasses, broadcast big sagebrush but drill grasses, etc.).

- f. Emphasize bunchgrass over sod-forming grasses in seed mixes in order to provide more effective wildlife cover and to facilitate forb and shrub establishment.
- g. Seed immediately after recontouring and spreading topsoil. Spread topsoil and conduct seeding during optimal periods for seed germination and establishment. Use of the same contractor for re-contouring land as used for seeding is often the most effective approach.
- h. Do not include aggressive, non-native grasses (e.g., intermediate wheatgrass, pubescent wheatgrass, crested wheatgrass, smooth brome, etc.) in reclamation seed mixes. Site specific exceptions may be considered.
- i. Distribute quick germinating site adapted native seed or sterile non-native seed for interim reclamation on cut and fill slopes and topsoil piles.
- j. Plan for reclamation failure and be prepared to repeat seeding as necessary to meet vegetation cover, composition, and diversity standards.

2. Vegetative Cover Standard

- a. Choose reference areas as goals for reclamation that have high wildlife value, with attributes such a diverse and productive understory of vegetation, productive and palatable shrubs, and a high prevalence of native species.
- b. Establish vegetation with total perennial non-invasive plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.
- c. Establish vegetation with plant diversity of non-invasive species which is at least half that of pre-disturbance or reference area levels. Quantify diversity of vegetation using a metric that considers only species with at least 3 percent relative plant cover.
- d. Observe and maintain a performance standard for reclamation success characterized by the establishment of a self-sustaining, vigorous, diverse, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development.

3. Timing

- a. Use early and effective reclamation techniques, including interim reclamation to accelerate return of disturbed areas for use by wildlife.
- b. Remove all unnecessary infrastructure.
- c. Close and reclaim roads not necessary for development immediately, including removing all bridges and culverts and recontouring/reclaiming all stream crossings.
- d. Reclaim reserve pits as quickly as possible after drilling and ensure that pit contents do not contaminate soil.
- e. Remediate hydrocarbon spills on disturbed areas prior to reclamation.
- f. Reclaim sites during optimum seasons (e.g. late fall/early winter or early spring).
- g. Complete final reclamation activities so that seeding occurs during the first optimal season following plugging and abandonment of oil and gas wells.

Interim Reclamation

4. Interim reclamation

a. Use a variety of native grasses and forbs to establish effective, interim reclamation on all disturbed areas (e.g., road shoulders and borrow areas), including disturbed areas where additional future ground disturbance is expected to occur.

b. Oxy will make a good-faith effort to perform interim reclamation to final reclamation species composition and establishment standards.

c. Perform "interim" reclamation on all disturbed areas not needed for active support of production operations.

5. Riparian areas (none associated with this pad or associated access roads and pipelines)

a. Replace all riparian vegetation removed during development at a rate of at least 3:1.

b. Restore both form and function of impacted wetlands and riparian areas and mitigate erosion.

6. Disposal

a. Remove well pad and road surface materials that are incompatible with post-production land use and re-vegetation requirements.

b. Remove and properly dispose of degraded silt fencing and erosion control materials after their utility has expired.

c. Remove and properly dispose of pit contents where contamination of surface water, groundwater, or soil by pit contents cannot be effectively prevented.

7. Establishing reclaimed areas

a. Apply certified weed free mulch and crimp or tacy to remain in place to reclaim areas for seed preservation and moisture retention.

b. Utilize staked soil retention blankets for erosion control and reclamation of large surface areas with 3:1 or steeper slopes. Avoid use of plastic blanket materials, known to cause mortality of snakes.

c. Control weeds in areas surrounding reclamation areas in order to reduce weed competition.

d. Educate employees and contractors about weed issues.

- Use early and effective reclamation techniques, including an aggressive interim reclamation program, to return habitat to use by greater sage-grouse as quickly as possible.
- Gate single-purpose roads and restrict general public access to reduce traffic disruptions to wildlife.
- Close and immediately reclaim all roads that are redundant, not used regularly, or have been abandoned to the maximum extent possible to minimize disturbance and habitat fragmentation.
- Avoid aggressive non-native grasses and shrubs in mule deer and elk habitat restoration.
- Reclaim mule deer and elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed.
- Restore disturbed sagebrush sites with the appropriate sagebrush species or subspecies on disturbed sagebrush sites. Use locally collected seed for reseeding where possible.

S/A/V: ACTION **Comment:** _____

CA: _____ **Date:** _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
WADDLES	No		

S/A/V: ACTION
REQUIRED

Corrective Action: **Implement BMP's to protect soil erosion from occurring.** Date: 12/15/2014

Comments: Erosion BMPs: **There is no stormwater controls where timber has recently been cut causing ground disturbance. SEE ATTACHED PHOTOS**

Other BMPs: **BMP 4a. Use a variety of native grasses and forbs to establish effective, interim reclamation on all disturbed areas (e.g., road shoulders and borrow areas), including disturbed areas where additional future ground disturbance is expected to occur.**

Comment: _____

Staking:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Inspector Name: COSTA, RYAN

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Facility

Facility ID: 211825 Type: WELL API Number: 055-06062 Status: PR Insp. Status: PR

Facility ID: 437077 Type: WELL API Number: 055-06315 Status: XX Insp. Status: XX

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment:

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

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

Field Parameters:

Sample Location:

Complaint:				
Tracking Num	Category	Assigned To	Description	Incident Date
200410625	LAND USE CONFLICT	Gintautas, Peter	(08/15/14) @ 7:45 am :I got a call from Carrol Koscove asking me to meet her at 10:00 am on (08/27/14). She was not happy with the way Oxy was using her land. She said her trees were gone and according to Aaron Richter/BLM, Oxy had cut the trees before permits were issued. Where the trees were, now there is knapweed. Also there was some type of (creekbed or spring) in area.	08/19/2014

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

- 1003a. Debris removed? _____ CM _____ CA _____ CA Date _____
Waste Material Onsite? _____ CM _____ CA _____ CA Date _____
Unused or unneeded equipment onsite? _____ CM _____ CA _____ CA Date _____
Pit, cellars, rat holes and other bores closed? _____ CM _____ CA _____ CA Date _____
Guy line anchors removed? _____ CM _____ CA _____ CA Date _____
Guy line anchors marked? _____ CM _____ CA _____ CA Date _____

- 1003b. Area no longer in use? _____ Production areas stabilized? _____
1003c. Compacted areas have been cross ripped? _____
1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
Cuttings management: _____
1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003 f. Weeds Noxious weeds? _____

Comment: Wood mulch debris remains on soil surface where timber has been cut (SEE ATTACHED PHOTOS #4, #9, #10). The thick layer of mulch debris can impede plant growth and establishment. Remove wood mulch debris to allow vegetation establishment.

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

Reminder: _____

Comment: _____

- Well plugged _____ Pit mouse/rat holes, cellars backfilled _____
Debris removed _____ No disturbance /Location never built _____

Inspector Name: COSTA, RYAN

Access Roads Regraded _____ Contoured _____ Culverts removed _____
 Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

Comment: _____

Corrective Action: _____ Date _____

Overall Final Reclamation Well Release on Active Location Multi-Well Location

Storm Water:

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

S/A/V: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Wood mulch debris remains on soil surface which can cause soil degradation. Remove and dispose of wood mulch debris prior to salvaging the topsoil. SEE ATTACHED PHOTOS #4, #9, #10	CostaR	11/17/2014

Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
673501822	Site Photo	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3485553

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)