



COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

December 7, 2015

William Bledsoe
P.O. Box 396
Hugo, CO 80821

Dear Mr. Bledsoe,

The Colorado Oil and Gas Conservation Commission (COGCC) received your complaint regarding road maintenance at the Bledsoe Ranch location. Your complaint is documented in COGCC document number 200437216, which can be found on the "Complaints" page, off of our main website at <http://cogcc.state.co.us/>. The COGCC investigated this complaint and documented the results in COGCC document number 200437315.

The following actions were taken to address your complaint:

- On 09/18/2015, COGCC inspector Craig Quint conducted a site inspection of the Bledsoe Ranch location (documented in Field Inspection Report [FIR] #680000142, attached);
- Mr. Quint issued FIR #680000142 with action required items including the following:
 - Repair road, and
 - Install BMPs;
- Mr. Quint spoke with Bob Rogers (Citation Oil and Gas Corp) to discuss options to repair the road; and
- On 11/18/2015 Mr. Quint conducted a follow-up inspection of the Bledsoe Ranch location (documented in FIR #680000203, attached).


During the follow-up inspection, Mr. Quint noted road repairs had been completed and BMPs had been installed as required by FIR #680000142.



Mr. Bledsoe
December 7, 2015
Page 2

The COGCC has determined that no violations occurred related to your complaint. Accordingly, the COGCC has closed the complaint and will not issue a notice of alleged violation (NOAV) related to this complaint. If you have questions relating to the complaint or investigation please contact me.

Sincerely,


Megan Adamczyk

COGCC Complaint Specialist
303-894-2100 x5145
dnr_cogcc.complaints@state.co.us

Inspector Name: QUINT, CRAIG

**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:

09/18/2015

Document Number:

680000142

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

| | | | | | |
|---------------------|-------------|--------|-----------------|--------------------------|-------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name: | On-Site Inspection | 2A Doc Num: |
| | 207513 | 321613 | QUINT, CRAIG | <input type="checkbox"/> | |

Operator Information:

OGCC Operator Number: 17180

Name of Operator: CITATION OIL & GAS CORP

Address: 14077 CUTTEN RD

City: HOUSTON State: TX Zip: 77269

- ☐ 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 |
|-------------------|--------------------------|-------------------|-------------------|
| Kennedy, Herschel | 719-767-8851 off | hkennedy@cogc.com | 719-340-1150 cell |
| Rogers, Bob | 719-767-8851 | brogers@cogc.com | 719-340-1445 cell |
| ELSOM, LEE ANN | 281-891-1577 EXT 1577 | lelsom@cogc.com | |

Compliance Summary:

QtrQtr: NWNW Sec: 31 Twp: 12S Range: 50W

| Insp. Date | Doc Num | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 10/01/2014 | 668900241 | PR | PR | SATISFACTORY | P | | No |
| 03/05/2013 | 668600454 | PR | PR | SATISFACTORY | P | | No |
| 09/19/2011 | 200321619 | PR | PR | SATISFACTORY | | | No |
| 05/03/2010 | 200245969 | PR | PR | SATISFACTORY | | | No |
| 02/19/2008 | 200127160 | PR | PR | SATISFACTORY | | | No |
| 12/11/2000 | 200012710 | PR | PR | SATISFACTORY | I | Pass | No |
| 12/23/1997 | 500138772 | PR | PR | | | Pass | No |
| 09/18/1996 | 500138771 | PR | PR | | | Pass | No |
| 06/22/1995 | 500138770 | PR | PR | | | Pass | No |
| 11/17/1993 | 500138769 | | PR | | | Pass | No |

Inspector Comment:**Related Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status | |
|-------------|------|--------|-------------|------------|-----------|-------------------------|-------------|-------------------------------------|
| 207513 | WELL | PR | 12/10/2005 | OW | 017-06448 | BLEDSOE RANCH 11F-31 #5 | PR | <input checked="" type="checkbox"/> |

Equipment:**Location Inventory**

Inspector Name: QUINT, CRAIG

| | | | |
|-----------------------------|------------------------|---------------------|-------------------------|
| Special Purpose Pits: _____ | Drilling Pits: _____ | Wells: _____ | Production Pits: _____ |
| Condensate Tanks: _____ | Water Tanks: _____ | Separators: _____ | Electric Motors: _____ |
| Gas or Diesel Motors: _____ | 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 | ACTION REQUIRED | Partially elevated gravel lease road through pasture with areas of erosion. | Repair road and install BMP's | 09/28/2015 |

Signs/Marker:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|----------------------|------------------------------|---------------------|-------------------|---------|
| BATTERY | SATISFACTORY | Lease sign by tanks | | |
| WELLHEAD | SATISFACTORY | Lease sign by unit | | |
| TANK LABELS/PLACARDS | SATISFACTORY | Stickers on tanks | | |

Emergency Contact Number (S/AV): SATISFACTORY

Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

| Type | Area | Volume | Corrective action | CA Date |
|------|------|--------|-------------------|---------|
|------|------|--------|-------------------|---------|

☐ Multiple Spills and Releases?

Fencing/:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|--------------|------------------------------|------------------------------------------------------|-------------------|---------|
| TANK BATTERY | SATISFACTORY | Steel panels around all battery equipment. | | |
| WELLHEAD | SATISFACTORY | Steel panels around wellhead and cathodic rectifier. | | |

Venting:

| Yes/No | Comment |
|--------|---------|
| | |

Flaring:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|------|------------------------------|---------|-------------------|---------|
| | | | | |

Predrill

Location ID: 207513

Site Preparation:

Lease Road Adeq.: _____

Pads: _____

Soil Stockpile: _____

S/AV: _____

Corrective Action: _____

Date: _____

CDP Num.: _____

Form 2A COAs:

S/AV: SATISFACTORY

Comment:

No issues observed

CA: _____

Date: _____

Wildlife BMPs:

S/AV: _____ Comment: _____

CA: _____

Date: _____

Stormwater:

Comment: _____

Staking:**On Site Inspection (305):****Surface Owner Contact Information:**

Name: _____

Address: _____

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: 207513 Type: WELL API Number: 017-06448 Status: PR Insp. Status: PR

Producing Well

Comment: Producing

Complaint

Comment: Doc #200437216, Talked with Mr. Bledsoe (land owner) and Bob Rogers (Citation). Mr. Bledsoe wants Citation to Haul in dirt to build up the road to keep it from eroding and weeds growing. Citation wants to repair the road but doesn't want to haul in the dirt.

Environmental**Spills/Releases:**

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

Inspector Name: QUINT, CRAIG

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

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

Water Well: _____ Lat _____ Long _____

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

Field Parameters: _____

Sample Location: _____

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: _____

Comment: _____

1003a. Debris removed? Pass CM _____

CA _____ CA Date _____

Waste Material Onsite? Pass CM _____

CA _____ CA Date _____

Unused or unneeded equipment onsite? Pass CM _____

CA _____ CA Date _____

Pit, cellars, rat holes and other bores closed? Pass 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 _____

Inspector Name: QUINT, CRAIG

Non-Cropland

Top soil replaced _____

Recontoured _____

80% Revegetation _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____

Pit mouse/rat holes, cellars backfilled _____

Debris removed _____

No disturbance /Location never built _____

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Compaction | Pass | Compaction | Fail | | | |
| | | Ditches | Fail | | | |
| Gravel | Pass | Gravel | Fail | | | |

S/AV: **ACTION REQUIRED**

Corrective Date: **09/28/2015**

Comment: **Areas of erosion on Lease road.**

CA: **Repair road and install BMP's**

Pits: ☒ NO SURFACE INDICATION OF PIT

Attached Documents

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

| Document Num | Description | URL |
|--------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 680000143 | Areas of Erosion | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3688692 |

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.)

Inspector Name: QUINT, CRAIG

**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:
11/18/2015Document Number:
680000203Overall Inspection:
SATISFACTORY**FIELD INSPECTION FORM**

| | | | | | |
|---------------------|-------------|--------|-----------------|--------------------------|-------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name: | On-Site Inspection | 2A Doc Num: |
| | 207513 | 321613 | QUINT, CRAIG | <input type="checkbox"/> | |

Operator Information:OGCC Operator Number: 17180Name of Operator: CITATION OIL & GAS CORPAddress: 14077 CUTTEN RDCity: HOUSTON State: TX Zip: 77269

- ☒ 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 |
|----------------|--------------------------|------------------|-------------------|
| Rogers, Bob | 719-767-8851 | brogers@cogc.com | 719-340-1445 cell |
| ELSOM, LEE ANN | 281-891-1577 EXT 1577 | lelsom@cogc.com | |

Compliance Summary:QtrQtr: NWNW Sec: 31 Twp: 12S Range: 50W

| Insp. Date | Doc Num | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 09/18/2015 | 680000142 | PR | PR | ACTION REQUIRED | | | No |
| 10/01/2014 | 668900241 | PR | PR | SATISFACTORY | P | | No |
| 03/05/2013 | 668600454 | PR | PR | SATISFACTORY | P | | No |
| 09/19/2011 | 200321619 | PR | PR | SATISFACTORY | | | No |
| 05/03/2010 | 200245969 | PR | PR | SATISFACTORY | | | No |
| 02/19/2008 | 200127160 | PR | PR | SATISFACTORY | | | No |
| 12/11/2000 | 200012710 | PR | PR | SATISFACTORY | I | Pass | No |
| 12/23/1997 | 500138772 | PR | PR | | | Pass | No |
| 09/18/1996 | 500138771 | PR | PR | | | Pass | No |
| 06/22/1995 | 500138770 | PR | PR | | | Pass | No |
| 11/17/1993 | 500138769 | | PR | | | Pass | No |

Inspector Comment:**Related Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status | |
|-------------|------|--------|-------------|------------|-----------|-------------------------|-------------|-------------------------------------|
| 207513 | WELL | PR | 12/10/2005 | OW | 017-06448 | BLEDSOE RANCH 11F-31 #5 | PR | <input checked="" type="checkbox"/> |

Equipment:**Location Inventory**

Inspector Name: QUINT, CRAIG

| | | | |
|-----------------------------|------------------------|---------------------|-------------------------|
| Special Purpose Pits: _____ | Drilling Pits: _____ | Wells: _____ | Production Pits: _____ |
| Condensate Tanks: _____ | Water Tanks: _____ | Separators: _____ | Electric Motors: _____ |
| Gas or Diesel Motors: _____ | 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 | Partially elevated gravel road though pasture. Road has been repaired and BMP's installed as required by previous inspection (680000142) | | |

Signs/Marker:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|----------------------|------------------------------|---------------------|-------------------|---------|
| WELLHEAD | SATISFACTORY | Lease sign by well | | |
| BATTERY | SATISFACTORY | Lease sign by tanks | | |
| TANK LABELS/PLACARDS | SATISFACTORY | Stickers on tanks | | |

Emergency Contact Number (S/A/V): SATISFACTORY

Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

| Type | Area | Volume | Corrective action | CA Date |
|------|------|--------|-------------------|---------|
|------|------|--------|-------------------|---------|

☐ Multiple Spills and Releases?

Fencing/:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|--------------|------------------------------|--------------------------------------------|-------------------|---------|
| WELLHEAD | SATISFACTORY | Steel panels around all wellhead equipment | | |
| TANK BATTERY | SATISFACTORY | Steel panels around all battery equipment. | | |

Venting:

| Yes/No | Comment |
|--------|---------|
| NO | |

Flaring:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|------|------------------------------|---------|-------------------|---------|
| | | | | |

Predrill

Location ID: 207513

Site Preparation:

Lease Road Adeq.: _____

Pads: _____

Soil Stockpile: _____

S/A/V: _____

Corrective Action: _____

Date: _____ CDP Num.: _____

Form 2A COAs:

S/A/V: SATISFACTORY

Comment:

No issues observed

CA: _____

Date: _____

Wildlife BMPs:

S/A/V: _____ Comment: _____

CA: _____

Date: _____

Stormwater:

Comment: _____

Staking:**On Site Inspection (305):****Surface Owner Contact Information:**

Name: _____

Address: _____

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: 207513 Type: WELL API Number: 017-06448 Status: PR Insp. Status: PR

Producing Well

Comment: Producing

Environmental**Spills/Releases:**

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

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Inspector Name: QUINT, CRAIG

| | | | |
|--------------------------------------|----------------------------------------------------|------------------------------|------------|
| Proximity to Surface Water: _____ | | Depth to Ground Water: _____ | |
| Water Well: | | Lat _____ | Long _____ |
| DWR Receipt Num: _____ | Owner Name: _____ | GPS : _____ | _____ |
| Field Parameters: | | | |
| Sample Location: _____ | | | |
| 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: _____

Comment: _____

1003a. Debris removed? Pass CM _____

CA _____ CA Date _____

Waste Material Onsite? Pass CM _____

CA _____ CA Date _____

Unused or unneeded equipment onsite? Pass CM _____

CA _____ CA Date _____

Pit, cellars, rat holes and other bores closed? Pass CM _____

CA _____ CA Date _____

Guy line anchors removed? _____ CM _____

CA _____ CA Date _____

Guy line anchors marked? Pass 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? _____

Inspector Name: QUINT, CRAIG

Comment: _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____

Pit mouse/rat holes, cellars backfilled _____

Debris removed _____

No disturbance /Location never built _____

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Gravel | Pass | Ditches | Pass | | | |
| | | Berms | Pass | | | |
| | | Gravel | Pass | | | |
| Compaction | Pass | Compaction | Pass | | | |

S/AV: SATISFACTOR
Y

Corrective Date: _____

Comment: Road has been repaired and BMP's installed as required by previous inspection done for complaint (Doc #200437216).

CA: _____

Pits: ☒ NO SURFACE INDICATION OF PIT