



**COLORADO**

**Oil & Gas Conservation  
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

November 23, 2016

M. Theresa Fitzgerald  
1028 CR 525  
Bayfield, CO 81122

Dear Ms. Fitzgerald,

The Colorado Oil and Gas Conservation Commission (COGCC) received your complaint regarding erosion and stormwater control at the Frahm Federal 1 well operated by BP America Production Company (BP). Your complaint is documented in COGCC document number 200439616, which can be found via the "Complaints" link, on our website (<http://cogcc.state.co.us/>). COGCC staff investigated this complaint and documented the results in COGCC document number 200440564.

The following actions were taken to address your complaint:

- On 06/07/2016 COGCC Inspector Cal St. John conducted an inspection of the Frahm Federal 1 (documented in Field Inspection Report [FIR] #685300617, attached). The FIR was issued to BP with corrective actions required to repair erosion channel and prevent stormwater flow from causing the failure again and to repair other stormwater BMPs on location;
- On 08/18/2016 Mr. St. John conducted a follow-up inspection (documented in FIR #685301109, attached) and determined that the erosion collapse feature had been repaired and stormwater work was performed;
- On 08/31/2016 SW Inspection Supervisor Steve Labowskie conducted an additional inspection (documented in FIR #685200221, attached) and found several BMPs were not installed per accepted details and issued additional corrective actions for operator improve BMPs and their installation to obtain adequate controls; and
- On 10/25/2016 Mr. Labowskie conducted a follow-up inspection (documented in FIR #685200230, attached) and documented improved BMPs installation and determined stormwater controls are adequate.

Based on the above described investigation the COGCC has determined that the operator complied with all action required and the COGCC will not issue a notice of alleged violation (NOAV) related to this complaint. Accordingly, the COGCC has closed your complaint.

P 303.894.2100 F 303.894.2109 [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

Commissioners: Andrew L. Spielman - Chairman, Ashley L. Ager, John H. Benton,  
James W. Hawkins, Tommy Holton, Kent Jolley, W. Perry Pearce, Robert W. Randall, Dr. Larry Wolk  
John W. Hickenlooper, Governor | Robert W. Randall, Executive Director, DNR | Matthew J. Lepore, Director



*Ms. Fitzgerald*  
*November 23, 2016*  
*Page 2*

If you have questions regarding this complaint or the investigation please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Megan J. Adamczyk". The signature is written in a cursive style with a large initial 'M' and 'A'.

Megan Adamczyk, Complaint Specialist  
Phone: 888-235-1101  
Email: [dnr\\_cogcc.complaints@state.co.us](mailto:dnr_cogcc.complaints@state.co.us)

**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



Inspection Date:  
08/16/2016  
Document Number:  
685301109  
Overall Inspection:  
SATISFACTORY

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>216211</u>	<u>326310</u>	<u>St John, William (Cal)</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10000</u>
Name of Operator:	<u>BP AMERICA PRODUCTION COMPANY</u>
Address:	<u>380 AIRPORT RD</u>
City:	<u>DURANGO</u> State: <u>CO</u> Zip: <u>81303</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
Inspections, All		SanJuanCOGCC@bp.com	SW Inspection Reports
Beebe, Sabre	970-375-7530	Sabre.Beebe@bp.com	SW Inspection Reports
Labowskie, Steve		steve.labowskie@state.co.us	COGCC

**Compliance Summary:**

QtrQtr: SWSE Sec: 10 Twp: 34N Range: 6W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
06/07/2016	685300617	PR	PR	AR			No
06/01/2012	661700367	PR	PR	SATISFACTORY	Pass		No
05/10/1999	500150230	BH	PR			Pass	No
01/11/1999	500150229	CO	PR			Pass	No
08/27/1998	500150228	CO	PR			Pass	No
06/25/1998	500150227	CO	PR			Pass	No

**Inspector Comment:**

This inspection conducted to follow up on complaint document number 200439616 and previous field inspection document number 685300617. This report contains comments see Lease Road, Good House Keeping, Interim Reclamation, and Storm Water Sections of report for additional details. Newly installed BMPs should manage stormwater run on/off for the location and prevent additional sediment migration problems associated with complaint. BMPs should be maintained and managed through self inspection to ensure their continued proper operation. All corrective actions were completed.

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
216211	WELL	PR	11/04/1991	GW	067-07817	FRAHM FEDERAL 1	PR <input checked="" type="checkbox"/>

**Equipment:**

Location Inventory

--

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	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			

**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	SATISFACTORY			
WELLHEAD	SATISFACTORY			

Emergency Contact Number (S/AR): SATISFACTORY Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	SATISFACTORY	Corrective action completed.		

**Spills:**

Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

**Fencing/:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY	Panel		
LOCATION	SATISFACTORY	Post and Wire		
OTHER	SATISFACTORY	Panel - Telemetry Equipment		
SEPARATOR	SATISFACTORY	Panel		

**Equipment:**

Type: Gas Meter Run	# 1	Satisfactory/Action Required: SATISFACTORY
Comment		
Corrective Action	Date:	
Type: Ancillary equipment	# 1	Satisfactory/Action Required: SATISFACTORY
Comment	Telemetry Equipment	

Corrective Action		Date:	
Type: Vertical Heated Separator	# 1	Satisfactory/Action Required:	SATISFACTORY
Comment			
Corrective Action		Date:	
Type: Flow Line	# 1	Satisfactory/Action Required:	SATISFACTORY
Comment			
Corrective Action		Date:	
Type: Ancillary equipment	# 1	Satisfactory/Action Required:	SATISFACTORY
Comment Wellhead			
Corrective Action		Date:	
Type: Bird Protectors	# 1	Satisfactory/Action Required:	SATISFACTORY
Comment			
Corrective Action		Date:	

**Tanks and Berms:**       New Tank      Tank ID: \_\_\_\_\_

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	OTHER	PBV STEEL	,
S/AR	SATISFACTORY		Comment:	
Corrective Action:			Corrective Date:	

Paint

Condition	Adequate
Other (Content)	_____
Other (Capacity)	95 BBLs
Other (Type)	_____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Corrective Action			Corrective Date	
Comment      Corrective action completed. Additional control measures will be needed to prevent additional vegetation growth inside containment area as grasses are already sprouting.				

**Venting:**

Yes/No	NO
Comment	

**Flaring:**

Type	Satisfactory/Action Required	
Comment:		
Corrective Action:	Correct Action Date:	

**Predrill**

Location ID: 216211

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

S/AR: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

**Wildlife BMPs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

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: 216211 Type: WELL API Number: 067-07817 Status: PR Insp. Status: PR

**Producing Well**

Comment: PR

**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: \_\_\_\_\_

<b>Water Well:</b>		Lat	Long
DWR Receipt Num:	Owner Name:	GPS :	

**Field Parameters:**

Sample Location:

<b>Complaint:</b>				
Tracking Num	Category	Assigned To	Description	Incident Date
200439616	STORMWATER BMPs	Labowskie, Steve	Sometime in the past few months the storm water containment on a BP well pad failed. BP visited the site on April 18, 2016 (Trenton Webber) and agreed to repair the berm and ditches as well as clean up the dirt washed onto the pad. I called 10 days later and was told the repair work was in a bidding process, thus far there has been no movement to repair the damage. We called Catherine Roy and were directed, but she feels she has no authority without a written complaint being filed... The well is the Frahm Federal Unit #1, located off CR 525 Bayfield, CO on the property of James and Mary T Fitzgerald.	06/03/2016

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. Waste and Debris removed? \_\_\_\_\_

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 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? \_\_\_\_\_ P \_\_\_\_\_

Comment: Corrective action completed. Additional weed control measures will be needed to manage new weed growth sprouting in recently disturbed areas.

Overall Interim Reclamation  In Process

**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					
Rip Rap	Pass					
Blankets	Pass	Gravel	Pass	Self Inspection		
Ditches	Pass					
Drains	Pass					
Berms	Pass	Compaction	Pass	Material Handling And Spill Prevention	Pass	
Compaction	Pass					

S/A/V: SATISFACTORY \_\_\_\_\_ Corrective Date: \_\_\_\_\_

Comment: Corrective action completed.

CA: \_\_\_\_\_

Inspector Name: St John, William (Cal)

**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
685301109	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3931149">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3931149</a>

**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



Inspection Date:  
06/07/2016  
Document Number:  
685300617  
Overall Inspection:  
**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>216211</u>	<u>326310</u>	<u>St John, William (Cal)</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10000</u>
Name of Operator:	<u>BP AMERICA PRODUCTION COMPANY</u>
Address:	<u>380 AIRPORT RD</u>
City:	<u>DURANGO</u> State: <u>CO</u> Zip: <u>81303</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
Inspections, All		SanJuanCOGCC@bp.com	SW Inspection Reports
Beebe, Sabre	970-375-7530	Sabre.Beebe@bp.com	SW Inspection Reports
Labowskie, Steve		steve.labowskie@state.co.us	COGCC

**Compliance Summary:**

QtrQtr: SWSE Sec: 10 Twp: 34N Range: 6W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
06/01/2012	661700367	PR	PR	SATISFACTORY	P		No
05/10/1999	500150230	BH	PR			Pass	No
01/11/1999	500150229	CO	PR			Pass	No
08/27/1998	500150228	CO	PR			Pass	No
06/25/1998	500150227	CO	PR			Pass	No

**Inspector Comment:**

This inspection conducted in response to complaint document number 200439616. This report contains corrective actions and comments. See Lease Road, Good House Keeping, Interim Reclamation, and Storm Water Sections of report for additional comments. See link at end of report for path to downloadable pictures.

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
216211	WELL	PR	11/04/1991	GW	067-07817	FRAHM FEDERAL 1	PR <input checked="" type="checkbox"/>

**Equipment:**

Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	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: _____

<b>Location</b>				
<b>Lease Road:</b>				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY			
<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
TANK LABELS/PLACARDS	SATISFACTORY			
Emergency Contact Number (S/AR): <u>SATISFACTORY</u>		Corrective Date: _____		
Comment: _____				
Corrective Action: _____				
<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	<b>ACTION REQUIRED</b>	Weeds and grass are growing inside fenced areas around production equipment.	Comply with Rule 603.f using the Rule 603.f guidance document for further details.	06/22/2016
<b>Spills:</b>				
Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				
<b>Fencing/:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
SEPARATOR	SATISFACTORY	Panel		
OTHER	SATISFACTORY	Panel - Telemetry Equipment		
WELLHEAD	SATISFACTORY	Panel		
LOCATION	SATISFACTORY	Post and wire.		
<b>Equipment:</b>				
Type: Ancillary equipment	# 1	Satisfactory/Action Required: SATISFACTORY		
Comment	Telemetry Equipment			
Corrective Action				Date:
Type: Ancillary equipment	# 1	Satisfactory/Action Required: SATISFACTORY		
Comment	Wellhead			
Corrective Action				Date:
Type: Vertical Heated Separator	# 1	Satisfactory/Action Required: SATISFACTORY		
Comment				
Corrective Action				Date:

Type: Flow Line	# 1	Satisfactory/Action Required: SATISFACTORY
Comment		
Corrective Action		Date:

**Facilities:**  New Tank Tank ID: \_\_\_\_\_

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	OTHER	PBV STEEL	37.224900,-107.514780
S/AR	SATISFACTORY		Comment:	
Corrective Action:			Corrective Date:	

**Paint**

Condition	Adequate
Other (Content)	_____
Other (Capacity)	95 BBLs
Other (Type)	_____

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Insufficient	Inadequate
Corrective Action	Remove weeds and grass and repair berm base area to comply with Rule 605.a.(4)			Corrective Date 07/11/2016
Comment	Weeds and grass are growing inside metal containment ring.			

**Venting:**

Yes/No	NO
Comment	

**Flaring:**

Type	Satisfactory/Action Required
Comment:	
Corrective Action:	Correct Action Date:

**Predrill**

Location ID: 216211

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

S/AR: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

**Wildlife BMPs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

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: 216211 Type: WELL API Number: 067-07817 Status: PR Insp. Status: PR

**Producing Well**

Comment: PR

**Complaint**

Comment: Landowner was concerned about erosion.

**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:** \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_  
 DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**Field Parameters:** \_\_\_\_\_

Sample Location: \_\_\_\_\_

**Complaint:**

Tracking Num	Category	Assigned To	Description	Incident Date
200439616	STORMWATER BMPs	Labowskie, Steve	Sometime in the past few months the storm water containment on a BP well pad failed. BP visited the site on April 18, 2016 (Trenton Webber) and agreed to repair the berm and ditches as well as clean up the dirt washed onto the pad. I called 10 days later and was told the repair work was in a bidding process, thus far there has been no movement to repair the damage. We called Catherine Roy and were directed, but she feels she has no authority without a written complaint being filed... The well is the Frahm Federal Unit #1, located off CR 525 Bayfield, CO on the property of James and Mary T Fitzgerald.	06/03/2016

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. Waste and Debris removed? \_\_\_\_\_  
 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 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? \_\_\_\_\_ F \_\_\_\_\_

Comment: NW corner and N perimeter require additional weed control measures to manage weed growth. Implement weed control measures to comply with Rule 1003.f no later than 07/11/2016.

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						
Berms	Pass	Compaction	Pass	MHSP	Fail		
Compaction	Fail	Gravel	Pass				
Ditches	Fail						

S/A/V: ACTION REQUIRED Corrective Date: 07/08/2016

Comment: West fill slope has rilling, erosion channels, and gully erosion. On the E cut slope water has cut a under ground channel at the top of the slope and and exits out of the slope approximately 10 - 12 feet down the slope depositing sediment to the N of the separator. See uploaded photos.

CA: Repair damaged areas and install or repair required BMPs per Rule 1002.f. Refer to the 1002.f guidance document for further details.

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
685300617	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875668">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875668</a>
685300621	Gulley erosion top of fill slope looking W	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875637">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875637</a>
685300622	Gulley erosion 2 top of fill slope looking W	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875638">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875638</a>
685300623	Weeds and grass inside tank containment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875639">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875639</a>
685300624	Hole at top of cut slope	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875640">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875640</a>
685300625	Exit hole in cut slope	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875641">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875641</a>
685300626	Weeds and grass around production equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875642">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875642</a>
685300627	Sediment deposit	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875643">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3875643</a>

**FORM  
INSP**

Rev  
X/15

**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:  
10/25/2016  
Submitted Date:  
10/26/2016  
Document Number:  
685200230

**FIELD INSPECTION FORM**

Loc ID 326310 Inspector Name: LABOWSKIE, STEVE 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:**

OGCC Operator Number: 10000  
Name of Operator: BP AMERICA PRODUCTION COMPANY  
Address: 380 AIRPORT RD  
City: DURANGO State: CO Zip: 81303

**Findings:**

9 Number of Comments  
0 Number of Corrective Actions  
 Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
Beebe, Sabre		sabre.beebe@bp.com	<a href="#">All Inspections</a>
Inspections, All		SanJuanCOGCC@bp.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
216211	WELL	PR	11/04/1991	GW	067-07817	FRAHM FEDERAL 1	PR

**General Comment:**

*(This area is currently blank for general comments.)*

**Location**

Overall Good:

**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:  Date: \_\_\_\_\_

**Good Housekeeping:**

Type	WEEDS		
Comment:	corrective actions adequately performed		
Corrective Action:		Date:	

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No	NO		
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 216211 Type: WELL API Number: 067-07817 Status: PR Insp. Status: PR

**Producing Well**

Comment: [PR](#)

Corrective Action:

Date:

**Complaint**

Comment: [All stromwater, ersosion and sediment migration and BMP maintenance issues raised in complaint doc# 200439616 have been adressed by operator.](#)

Corrective Action:

Date:

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? Pass

Comment [corrective action from previous inspection performed](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? Pass

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

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 Pass 80% Revegetation In

1003e. INTERIM VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

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 \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

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	Gravel				
Seeding	Pass					
Check Dams	Pass					many rock check dams in ditches and drains
Rip Rap	Pass					
Ditches	Pass					
Mulching	Pass					
Retention Ponds	Pass	Compaction				
Hydro Mulch	Pass					
Waddles	Pass					new installation, most stakes are vertical
Berms	Pass					

Comment: Note: Wattles crossed staked at ends but vertically staked for long sections. No BMP specs known by COGCC SW staff approve of this installation due to nature of BMP to rise up or float around vertical stakes. Otherwise call orrective actions adequately performed.

Corrective Action:

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

**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
685200230	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3990719">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3990719</a>

**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



Inspection Date:  
08/31/2016  
Document Number:  
685200221  
Overall Inspection:  
**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____
	<u>216211</u>	<u>326310</u>	<u>LABOWSKIE, STEVE</u>		

**Operator Information:**

OGCC Operator Number: <u>10000</u>
Name of Operator: <u>BP AMERICA PRODUCTION COMPANY</u>
Address: <u>380 AIRPORT RD</u>
City: <u>DURANGO</u> State: <u>CO</u> Zip: <u>81303</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
St John, William (Cal)		cal.stjohn@state.co.us	
Adamczyk, Megan		megan.adamczyk@state.co.us	
Beebe, Sabre		sabre.beebe@bp.com	All Inspections
Inspections, All		SanJuanCOGCC@bp.com	All Inspections

**Compliance Summary:**

QtrQtr: <u>SWSE</u>	Sec: <u>10</u>	Twp: <u>34N</u>	Range: <u>6W</u>				
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/16/2016	685301109	PR	PR	SATISFACTORY	In Process		No
06/07/2016	685300617	PR	PR	AR			No
06/01/2012	661700367	PR	PR	SATISFACTORY	Pass		No
05/10/1999	500150230	BH	PR			Pass	No
01/11/1999	500150229	CO	PR			Pass	No
08/27/1998	500150228	CO	PR			Pass	No
06/25/1998	500150227	CO	PR			Pass	No

**Inspector Comment:**

Inspection conducted by inspection supervisor to confirm repairs and corrective actions related to complaint number 200439616 and field check and override 8/16 inspection. See "stormwater", "housekeeping" and "interim reclamation sections for new corrective actions.

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
216211	WELL	PR	11/04/1991	GW	067-07817	FRAHM FEDERAL 1	PR <input checked="" type="checkbox"/>

**Equipment:**

Location Inventory

--

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	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**

**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
TANK LABELS/PLACARDS	SATISFACTORY			

Emergency Contact Number (S/AR): SATISFACTORY Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	new thistle growth on areas recently disturbed by construction on pad and on perimeter.	Control weeds per Rule 603.f, see guidance document for further details.	10/01/2016

**Spills:**

Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

**Venting:**

Yes/No	NO
Comment	

**Flaring:**

Type	Satisfactory/Action Required
Comment:	
Corrective Action:	Correct Action Date:

**Predrill**

Location ID: 216211

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

S/AR: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

**Wildlife BMPs:**

S/AR: \_\_\_\_\_ Comment: \_\_\_\_\_

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

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: 216211 Type: WELL API Number: 067-07817 Status: PR Insp. Status: PR

**Producing Well**

Comment: PR

**Complaint**

Comment: Corrective action to repair collapsed area and associated drainage problems prescribed in 6/17/2016 inspection doc# 685300617 in relation to complaint #200439616 have been satisfactorily performed, the collapse has been filled in, blanket material installed and the location run-on control ditch has been cleaned out/re-done. Installation of new BMPs is overall poor and not per accepted BMP specs/installation details, especially those related to berms and ditches. Unstabilized BMPs and sediment piles are now a potential sediment source. There is no sediment trap at outlet, just one check dam observed along ditches, ststep section of eyebrow ditch will deposit sediment at access road, there is no sediment trap or culvert in this area. Sediment from cut slope or possibly loose sediment piles above has already started to fill newly constructed run-on control ditch. See "stormwater" section for new corrective action.

**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:** \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_  
 DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**Field Parameters:** \_\_\_\_\_  
 Sample Location: \_\_\_\_\_

**Complaint:**

Tracking Num	Category	Assigned To	Description	Incident Date
200439616	STORMWATER BMPs	Labowskie, Steve	Sometime in the past few months the storm water containment on a BP well pad failed. BP visited the site on April 18, 2016 (Trenton Webber) and agreed to repair the berm and ditches as well as clean up the dirt washed onto the pad. I called 10 days later and was told the repair work was in a bidding process, thus far there has been no movement to repair the damage. We called Catherine Roy and were directed, but she feels she has no authority without a written complaint being filed... The well is the Frahm Federal Unit #1, located off CR 525 Bayfield, CO on the property of James and Mary T Fitzgerald.	06/03/2016

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. Waste and Debris removed? **Fail**

CM **bent section of metal piping observed in reclamation area**  
 CA **remove piping per Rule 1003** CA Date **10/01/2016**

Unused or unneeded equipment onsite? \_\_\_\_\_  
 CM \_\_\_\_\_ CA \_\_\_\_\_ CA Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_  
 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 \_\_\_\_\_ In \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_ I \_\_\_\_\_

Comment: Installation of eyebrow ditch and associated sediment piles in interim reclamation area, these piles do not form a complete and compacted berm, no additional contouring or seeding has been performed in the area along the trench.

Overall Interim Reclamation \_\_\_\_\_ In Process \_\_\_\_\_

**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
Ditches	Fail					not per accepted installation detail
Berms	Fail					not per accepted installation detail
Rip Rap	Pass	Compaction	Pass			
Check Dams	Pass					just one not very effective

Compaction	Pass	Gravel	Pass			
Blankets	Pass					north edge rolling up

S/A/V: **ACTION REQUIRED**      Corrective Date: **09/16/2016**

Comment: Significant amount of area has been disturbed in making new perimeter ditch and berm in addition to an "eyebrow" type ditch and berm feature. Loose Piles of sediment of eyebrow trenching observed, these are not constructed as a compacted berm and are not effective due to trench installed along entire uphill slope. 1 rock check dam observed in trenches, more are needed to denenergize flow laterally along ditches/trenches. No seeding, mulching or tackifier on bare newly disturbed areas, these areas need some sort of stabilization BMP. New weed growth observed on disturbed areas in places. Amount of disturbed area and sediment piles may cause additional sediment as constructed, rip-rap at outlet to control erosion but no sediment trap.

CA: Repair/modify/install BMPs in accordance with industry accepted BMP specs such as those found in this document <https://www.codot.gov/programs/environmental/water-quality/documents/CDOT%20Pocket%20Guide%20122211.pdf> to comply with Rule 1002.f, see guidance document for further details. Note: because this is related to a complaint and follow-up inspection, the corrective action date is shortened.

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
685200221	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941892">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941892</a>
685200222	new weed growth on disturbed area	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941884">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941884</a>
685200223	eyebrow trench and loose sediment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941885">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941885</a>
685200224	sediment already filling new ditch	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941886">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941886</a>
685200225	check dam	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941887">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941887</a>
685200226	ditches not graded into run down	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941888">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941888</a>
685200227	metal piping in rec area	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941889">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941889</a>
685200228	loose sediment piles from trenching	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941890">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941890</a>
685200229	loose sediment with no protections uphill of loc	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941891">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3941891</a>