



02187591

04.3.15

Staff's Objection with Exhibits

BEFORE THE OIL AND GAS CONSERVATION COMMISSION  
OF THE STATE OF COLORADO

IN THE MATTER OF THE APPLICATION OF ) CAUSE NO. 1  
SOVEREIGN ENERGY, LLC. FOR AN INACTIVE )  
WELL FINANCIAL ASSURANCE VARIANCE, ) DOCKET NO. 150300177  
BACA COUNTY, COLORADO )  
) TYPE: GENERAL  
) ADMINISTRATIVE

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**STAFF OBJECTION**

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The Staff of the Colorado Oil and Gas Conservation Commission (“Commission”) respectfully requests that the Commission deny the Application for Waiver of Rule 707(a) Requirement for Additional Financial Assurance (“Application”) filed by Sovereign Operating Company LLC (“Sovereign”) for the reasons set forth below.

**INTRODUCTION**

In September of 2014, Commission Staff issued a warning letter to Sovereign indicating that Sovereign had failed to comply with COGCC Rules of Practice and Procedure, 2 CCR 404-1 (“Rule” or “Rules”), Rule 707.a (Inactive Wells). Rule 707.a requires operators of inactive wells to post additional financial assurance. Following receipt of the warning letter, Sovereign representatives and Staff discussed a plan to return Sovereign to compliance with Rule 707.a. Despite diligent effort by both parties, Sovereign was unable to propose a plan that was acceptable to Staff. Therefore, Staff informed Sovereign that it would need to file an application with the Commission requesting a variance from Rule 707.a. Staff indicated that the filing of an application would stay any related enforcement action. Sovereign filed the Application, including a proposed compliance plan, for the Commission’s consideration. Staff objects to the plan and requests that the Commission deny the Application.

**BACKGROUND**

Rule 707.a reads as follows:

To the extent that an operator's inactive well count exceeds such operator's financial assurance amount divided by ten thousand dollars (\$10,000) for inactive wells less than three thousand (3,000) feet in total measured depth or twenty thousand dollars (\$20,000) for inactive wells greater than or equal to three thousand (3,000) feet in total measured depth, such additional wells shall be considered “excess inactive wells.” For each excess inactive well, an operator's required financial assurance amount under Rule 706 shall be increased by ten thousand dollars (\$10,000) for inactive wells less than three thousand (3,000) feet in total

measured depth or twenty thousand dollars (\$20,000) for inactive wells greater than or equal to three thousand (3,000) feet in total measured depth. This requirement shall be modified or waived if the Commission approves a plan submitted by the operator for reducing such additional financial assurance requirement, for returning wells to production in a timely manner, or for plugging and abandoning such wells on an acceptable schedule.

In determining whether such plan is acceptable, the Commission shall take into consideration such factors as: the number of excess inactive wells; the cost to plug and abandon such wells; the proportion of such wells to the total number of wells held by the operator; any business reason the operator may have for shutting-in or temporarily abandoning such wells; the extent to which such wells may cause or have caused a significant adverse environmental impact; the financial condition of the operator; the capability of the operator to manage such plan in an orderly fashion; and the availability of plugging and abandonment services. If an increase in financial assurance is ordered pursuant to this subsection, the operator may, at its option and in compliance with these 700 Series rules, submit new financial assurance or supplement its existing financial assurance.

In order to determine what qualifies as an “inactive well”, one must also review certain definitions found in the 100 Series of the Rules, including the following three definitions:

INACTIVE WELL shall mean any shut-in well from which no production has been sold for a period of twelve (12) consecutive months; any well which has been temporarily abandoned for a period of six (6) consecutive months . . .

SHUT-IN WELL shall mean a well which is capable of production or injection by opening valves, activating existing equipment or supplying a power source.

TEMPORARILY ABANDONED WELL shall mean a well that has all downhole completed intervals isolated with a plug set above the highest perforation such that the well cannot produce without removing a plug or a well which is incapable of production or injection without the addition of one or more pieces of wellhead or other equipment, including valves, tubing, rods, pumps, heater-treaters, separators, dehydrators, compressors, piping or tanks.<sup>1</sup>

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<sup>1</sup> Effective January 30, 2015, this definition was amended. That change has no impact on this matter.

Staff applies the following formula to an operator's inventory of inactive wells in order to determine the amount of additional financial assurance required by Rule 707.a:

# of Inactive Wells < 3,000 Ft. x \$10,000

+

# of Inactive Wells > 3,000 Ft. x \$20,000

-

Existing Financial Assurance

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Required Additional Financial Assurance

Here, Staff applied this formula to Sovereign's inactive wells and determined that Sovereign must post \$620,000 in additional financial assurance. This calculation follows:

# of Inactive Wells < 3,000 Ft. x \$10,000	=	None
+		
34 <sup>2</sup> Inactive Wells > 3,000 Ft. x \$20,000	=	\$680,000
-		
Existing Financial Assurance	=	\$60,000
<hr/>		
Required Additional Financial Assurance	=	\$620,000

Exhibit 1 is a list of inactive wells still at issue in this matter. These wells are part of a field that Sovereign owns in Baca County. These are relatively shallow gas wells that produce from the Topeka Formation. The field was developed beginning in the 1970's and has produced between 200,000 and 400,000 MCF of gas annually during Sovereign's ownership of the field, which began in 2011.

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<sup>2</sup> Staff initially believed that 21 of Sovereign's wells were inactive. Sovereign's initial Application addressed only those wells. After that, one well (the Murray A well) was plugged and abandoned and Staff also learned that, in fact, 34 of Sovereign's wells are inactive. Staff asked Sovereign to update its Application to reflect the revised total. This Objection addresses all 34 wells.

## OBJECTION

Although Staff understands the difficult business decisions that Sovereign is facing given current commodity prices, Rule 707.a is clear and Sovereign has failed to comply with its requirements. Staff requests that Sovereign's Application be denied for the following reasons.

Sovereign's Application begins by summarizing the ownership history of the subject wells and states that the "[d]eferred maintenance issues for these wells landed on the lap of Applicant when the Inactive Wells were acquired by Applicant in 2011." (App. pg. 2). There is nothing in the record to suggest that the acquisition of the subject wells was a surprise to Sovereign. According to the Application, Sovereign acquired the subject wells in 2011. (App. pg. 2). Rule 707.a predates 2011 and the need to comply with the rule shouldn't have been a surprise to Sovereign. COGCC records indicate that 18 of the subject wells qualified as inactive wells at the time of that acquisition. Ignoring the prior operator's failure to comply with Rule 707.a, Sovereign has failed to comply with Rule 707.a for over three and one-half years with respect to 18 of the subject wells. (Exhibit 1).

The fact that most of the subject wells were not returned to production or plugged and abandoned, even when commodity prices were relatively high,<sup>3</sup> indicates that the subject wells present a real risk of abandonment to the State of Colorado. COGCC records reveal that Sovereign sold 18,325 barrels of oil and 1,196,464 MCF of gas between 2012 and 2014. (Exhibit 2). Assuming conservative prices of \$50 oil and \$2 gas, Sovereign grossed \$3.3 million<sup>4</sup> between 2012 and 2014 and still failed to increase its inactive well financial assurance. The recent drop in commodity prices makes it less likely that Sovereign will comply with Rule 707.a unless the Commission demands it.

Next, Sovereign argues that the subject wells are just barely deeper than the 3,000 ft. threshold found in Rule 707.a. (App. pg. 2). Sovereign's argument is irrelevant. Rule 707.a created a threshold requirement at 3,000 ft., it is safely assumed, after careful consideration by the Commission when the rule was originally adopted. The Commission's thoughtful deliberations should not be thrown aside without good reason – good reason that Sovereign fails to provide. Though not clearly stated, Sovereign appears to be arguing that it should be required to post only the \$10,000 required of shallower wells and not the \$20,000 required of deeper wells. In the very next sentence, however, Sovereign admits that "plugging and abandoning wells in this area approximates \$18,000 per well, which assumes no recovered casing." (App. pg. 2). This estimate is barely less than the \$20,000 actually required by the rule and does not include the costs associated with reclamation of the surface. Without conducting an exhaustive analysis of site conditions, and assuming no environmental degradation,

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<sup>3</sup> The Henry Hub natural gas spot price increased from a low of \$1.95 in April, 2012 to a high of \$6.00 in February, 2014; West Texas Intermediate oil spot price increased from a low of \$82.30 in June, 2012 to a high of \$106.57 in August, 2013 – all during Sovereign's ownership of the subject wells. (<http://www.eia.gov>). Although not perfect analogies of prices actually received by Sovereign in the field, Staff believes it is safe to assume that prices in Colorado followed the same general trend.

<sup>4</sup>  $18,325 \times 50 + 1,196,464 \times 2 = \$3,309,178$

Denise Arthur, COGCC Reclamation Supervisor, estimates surface reclamation of most wells in Colorado at between \$15,000 and \$25,000. Adding \$15,000 to the estimated cost of \$18,000 to plug and abandon these wells and, conservatively, each well will cost \$33,000 to plug and reclaim despite the fact that some of the subject wells are barely deeper than 3,000 ft. Sovereign has failed to make a compelling case that decreasing the required financial assurance from \$20,000 make sense and has inadvertently proven that it should be higher.

Similarly, Sovereign has failed to prove that these wells will not cause or have not caused a significant adverse environmental impact, a consideration relevant to a Rule 707.a variance request. After Sovereign filed the Application, Peter Gintautas, COGCC Environmental Protection Specialist, conducted inspections at 21 of Sovereign's inactive wells. (Exhibit 1 – Summarizing inspections results); (Exhibit 3 – Inspection reports with select pictures); (Exhibit 4 – Summary of lab results); (Exhibit 5 – Lab results). Of these 21 inspections, none of the wells were deemed satisfactory from an environmental prospective and each of these wells required corrective action in order to comply with COGCC Rules. Most distressing were nine wells with apparent historic spills of produced water. For example, Mr. Gintautas identified one well that exceeded Table 910-1 standards for Electrical Conductivity ("EC"), and one well that exceeded the standard for Sodium Adsorption Ratio ("SAR"), and seven different wells that exceeded standards for both EC and SAR. (Exhibit 4). One sample, at the State St John 1-36 well, was 25 times greater than Table 910-1 permits for EC. EC and SAR are often an indication of a produced water spills which can kill existing vegetation and prevent future vegetation from growing. Elevated EC and SAR make reclamation of an oil and gas location more time-consuming and expensive. What these results indicate is that few of Sovereign's wells are environmentally pristine, which is a necessary prerequisite for a variance from Rule 707.a.

The Application notes that one-quarter of Sovereign's wells are shut-in. (App. pg. 2). In fact, COGCC records indicate that fully 45% of Sovereign's wells are inactive.<sup>5</sup> While there are certainly valid reasons to shut-in wells, Rule 707.a requires that Operators provide additional financial assurance in case those wells are abandoned to the State of Colorado. The 700 Series Rules, those dealing with financial assurance, generally assume producing wells. Producing wells are very unlikely to be abandoned to the State and so Rule 706 permits the posting of financial assurance for individual wells or the posting of a statewide blanket financial assurance. A statewide blanket financial assurance is typically sufficient to cover the cost of abandoning 3-5 wells. The balance struck by the Commission in crafting these rules was premised on the basic assumption that an operator has an inventory of *producing* wells. Once a well become inactive, and thus more likely to be abandoned, Operators are required to post additional financial assurance to ensure that the State of Colorado has the funds necessary to plug and reclaim a well should it be abandoned to the State. If an operator shuts-in a field or purchases an uneconomic field for speculative reasons, the operator may do so, but only after posting additional financial assurance should the speculation

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<sup>5</sup> After the abandonment of the Murray A well, Sovereign operates 75 wells in Baca County, 34 of which are inactive. 34/75=44%.

prove unwise or market prices fail to recover in a timely manner. The Application seeks to upend this process, leaving the State vulnerable. Sovereign admits it “has not set aside addition [sic] funds to provide financial security to Inactive Well,” (App. pg. 3). Which begs the question - why not? Providing additional financial assurance is the cost of owning inactive wells in Colorado and has been since Sovereign began operating these wells.

It bears noting that additional financial assurance posted to cover inactive wells can be returned to the Operator once the subject wells no longer qualify as inactive. Once Sovereign posts the required additional financial assurance, it can then begin the process of working to get that money<sup>6</sup> released and Sovereign can approach operations in this field however it sees fit. The Commission will not need to second guess those plans or oversee operations. Instead, once each well is returned to production or plugged and abandoned, Sovereign can request the release of \$20,000. That is the elegance of Rule 707.a. - assuming the proper financial assurance is posted, the State of Colorado is protected from possible abandonment and the Commission (and Staff) are not forced to micro-manage field operations that are best left in the Operator's hands.

For proof of the difficulty in negotiating, imposing, and monitoring a Rule 707.a. compliance plan, the Commission does not have to look any further than Exhibit A to the Application. As originally filed, Sovereign's Exhibit A proposed a plan with start dates from January, 2015 to February, 2016, all with a proposed completion date of May 1, 2016. (App., Original Exhibit A). The plan includes two proposals with estimated start dates that have already passed. The first was the plan to plug and abandon the Murray “A” well. That well has been plugged and abandoned and so is no longer relevant to this matter. The second was a plan to put the Loflin-Federal 1-21 well back on production. Sovereign estimated that operations to put that well back on production would commence in January of 2015. In the revised Exhibit A the start date has now been moved to April of 2015, among other revisions. (App., Revised Exhibit A). As of April 2, 2015, nothing has been filed with the Commission indicating that Sovereign has returned this well to production, despite contrary assertions in the Application. This type of contradiction, and the imprecise nature of the plan in general, only argues in favor of requiring the posting of additional financial assurance and avoiding the difficulty of negotiating, imposing, and monitoring a compliance plan.

In conclusion, Rule 707.a provides three potential bases for Commission modification of the rule. Sovereign has failed to satisfy any of the bases. First, Rule 707.a permits modification where the Operator has submitted a plan for “reducing such additional financial assurance requirement.” Sovereign has failed to provide such a plan and has instead argued for a complete waiver of the requirement to post additional financial assurance. If anything, the Application argues that the financial assurance requirement should be increased to cover both the plugging costs of \$18,000, as admitted by Applicant, and reclamation costs of \$15,000, as estimated by Staff. The final two bases are related and permit modification where the Operator has submitted a

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<sup>6</sup> Staff assumes that an insurance bond is not available to Sovereign.

plan “for returning wells to production in a timely manner, or for plugging and abandoning such wells on an acceptable schedule.” Sovereign has chosen not to provide a plan for plugging and abandoning its inactive wells and has instead indicated that it plans to return all of its inactive wells to production. While Sovereign has proposed a basic plan for returning wells to production, it has already failed to follow the plan as originally outlined in the Application and the plan can hardly be called *timely* if it will not be fully implemented until May 1, 2016. Because Sovereign has failed to satisfy any of the bases provided in Rule 707.a, the Application must be denied.

### **RELIEF REQUESTED**

1. Staff respectfully requests that the Commission deny the Application for Waiver of Rule 707(a) Requirement for Additional Financial Assurance filed by Sovereign Holdings/O&G LLC for the reasons set forth above.
2. Staff requests that the Commission order Sovereign to post an additional \$620,000 in financial assurance within 35 days of the mailing of the Commission’s order.

### **STAFF PRESENTATION AT THE HEARING**

#### ***A. Witness List***

Stuart Ellsworth, COGCC Engineering Manager, may testify about plugging and abandonment costs generally, information regarding the subject wells as indicated by COGCC records, and Sovereign’s Application and plan to return to compliance.

Martha Ramos, COGCC Financial Assurance Supervisor, may testify about Staff processes with respect to the 700 Series rules, communications with Sovereign relevant to this matter, and Sovereign’s Application and plan to return to compliance.

Jane Stanczyk, COGCC Permit Manager, may testify about Staff processes with respect to the 700 Series rules, communications with Sovereign relevant to this matter, and Sovereign’s Application and plan to return to compliance.

John Axelson, COGCC East Environmental Supervisor, may testify about the environmental condition of the subject wells, as determined by recent inspections.

#### ***B. Exhibit List***

- Exhibit 1 – List of Inactive wells
- Exhibit 2 – Production information
- Exhibit 3 – Inspection reports
- Exhibit 4 – Summary of laboratory analysis
- Exhibit 5 – Laboratory analysis

***C. Estimated Time Required for Case Presentation***

Staff anticipates its case presentation to require 1/2 hour.

Respectfully Submitted,

/s/ Jeremy I. Ferrin

Jeremy I. Ferrin, Enforcement Officer

**CERTIFICATE OF SERVICE**

I hereby certify on April 03, 2015, a true and correct copy of this Staff Objection was served by electronic mail upon the following:

Jill Dorancy  
*Presiding COGCC Hearing Officer*  
jill.dorancy@state.co.us

Thomas Niebrugge  
*Counsel for Sovereign*  
tniebrugge@lindquist.com

Colorado Oil and Gas Conservation Commission  
dnr\_cogccenforcement@state.co.us

\_\_\_\_\_  
/s/ Jeremy I. Ferrin  
Jeremy I. Ferrin, Enforcement Officer

## Exhibit 1

<u>API Number</u>	<u>Well Name</u>	<u>Well #</u>	<u>Depth</u>	<u>Last Sales</u>	<u>707a Compliance Past-Due<sup>1</sup></u>	<u>Last Inspection Date</u>	<u>Inspection Status</u>
05-009-06644	DUNIVAN	1-11	3410	No sales Spud Date: 2/1/2008	1290 days	02/20/2015	Action Required
05-009-06647	GIBSON	1-19	3420	No sales Spud Date: 5/3/2008	1290 days	03/09/2015	Action Required
05-009-06652	SHARP GIBSON	1-24	3420	No sales Spud Date: 3/23/2008	1290 days	03/09/2015	Action Required
05-009-06651	ROBBINS	1-16	3400	No sales Spud Date: 3/14/2008	1290 days	03/09/2015	Action Required
05-009-06599	COTTRELL-RUTHERFORD	2-17	3500	03/2004	1290 days	02/20/2015	Action Required
05-009-06600	THOMPSON-JEFFREY	1-13	3400	12/2006	1290 days	02/20/2015	Action Required
05-009-06398	COGBURN-WECO A	1	3400	03/2007	1290 days	03/09/2015	Action Required
05-009-05308	STATE-ST JOHN	1-36	3430	11/2007	1290 days	02/09/2015	Action Required
05-009-06159	COGBURN	1	3350	01/2008	1290 days	02/20/2015	Action Required
05-009-06645	BURHENN	1-12	3420	08/2008	1290 days	02/20/2015	Action Required
05-009-06140	MOORE 'C'	1	3295	01/2009	1290 days	03/12/2015	Action Required
05-009-06586	MURRAY C	2	3320	01/2009	1290 days	03/12/2015	Action Required
05-009-06653	FULBRIGHT	1-20	3500	01/2009	1290 days	02/20/2015	Action Required
05-009-06646	GIBSON	1-25	3479	02/2009	1290 days	02/20/2015	Action Required
05-009-06135	MURRAY 'C'	1	3276	03/2009	1290 days	03/12/2015	Action Required
05-009-06650	WRIGHT	1-7	3420	03/2009	1290 days	03/09/2015	Action Required
05-009-06173	STATE 267-S	1	3334	06/2009	1290 days	03/12/2015	Action Required
05-009-06648	BAR-B-4 RANCH	1-15	3420	06/2010	1290 days	02/20/2015	Action Required
05-009-06162	HEFLEY 'A'	1	3325	6/2012	653 days	NA	
05-009-06131	MURRAY B	1	3259	8/2012	591 days	NA	
05-009-06142	SMITH 'H'	1	3270	8/2012	591 days	NA	
05-009-06268	ROBBINS RANCH 'C'	1	3335	8/2012	591 days	NA	
05-009-06215	COMMERCE RANCH INC. 'B'	1	3400	9/2012	561 days	NA	
05-009-06035	LOFLIN-FEDERAL	1-21	3482	01/2013	437 days	02/20/2015	Action Required
05-009-06158	HARTMETZ	1-9	3400	3/2013	379 days	NA	
05-009-06189	HEFLEY	2	3315	7/2013	257 days	NA	
05-009-06175	STATE 267-S	2	3340	7/2013	257 days	NA	
05-009-06322	LOFLIN	1-8	3450	7/2013	257 days	NA	

<sup>1</sup> As of April 13, 2015. Beginning when ownership was assumed (10/01/2011 for all wells), if Rule 707.a compliance was already past due, or one year after date of last sales for all other wells.

## Exhibit 1

05-009-06174	TRAHERN 'A'	1	5483	7/2013	256 days	NA	
05-009-06231	TOLBERT	1	3350	9/2013	196 days	NA	
05-009-06146	TRAHERN	1	3275	10/2013	165 days	NA	
05-009-06147	BURCHFIELD	1-33	3320	10/2013	165 days	NA	
05-009-06176	STATE OF COLORADO	1-16	3350	12/2013	104 days	03/12/2015	Action Required

34 inactive wells total (34x\$20,000= \$680,000) \$680,000 - \$60,000 (existing financial assurance) = \$620,000 in additional financial assurance required.

The information compiled in this Exhibit summarizes information contained in the files of the Commission, including information contained on Scout Cards, Form 7s - Operator's Monthly Report of Operations, and Inspection Reports. All of this information is available on the COGIS Database. Most of these file are not included as attachments or exhibits due to their voluminous nature. Pursuant to Rule 519.c., the Commission may take administrative notice of document in the files of the Commission.

- HOME
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- NEWS/MEDIA
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- PERMITS
- POLICIES
- RULES
- STAFF RPT
- STATISTICS
- TOOLS

### COGIS - Production Data Inquiry

You requested production by:	operators
Operator number:	10383
Maximum records are limited to:	5000
Year range:	2012 to 2015
For monthly detail:	Click on year

Annual Production by Operator - 3 record(s) returned.						
Operator	Year	Oil Production (barrels)	Oil Sales (barrels)	Gas Production (MCF)	Gas Sales (MCF)	Water Production (barrels)
SOVEREIGN OPERATING COMPANY LLC - #10383	<a href="#">2012</a>	8,340	7,323	514,026	514,026	15,838
SOVEREIGN OPERATING COMPANY LLC - #10383	<a href="#">2013</a>	7,488	7,639	404,867	404,867	12,377
SOVEREIGN OPERATING COMPANY LLC - #10383	<a href="#">2014</a>	3,406	3,363	277,571	277,571	11,543

**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



DE	ET	OE	ES
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Inspection Date:  
02/09/2015

Document Number:  
678300068

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205559</u>	<u>320965</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Costa, Ryan		ryan.costa@state.co.us	
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Pumper (Baca)
Clasen, Stephanie	303-297-0347	sclasen@bsegllc.com	All Inspections

**Compliance Summary:**

QtrQtr:	<u>SWNE</u>	Sec:	<u>36</u>	Twp:	<u>30S</u>	Range:	<u>45W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/20/2013	668601259	SI	TA	SATISFACTORY	P		No
05/05/2010	200247177	CO	TA	<b>ACTION REQUIRED</b>			Yes
06/13/2008	200191025	MT	SI	SATISFACTORY			No
01/02/2008	200124168	PR	SI	SATISFACTORY			No
12/13/2000	200012676	PR	PR	SATISFACTORY	I	Pass	No
02/08/2000	200003790	PR	PR	SATISFACTORY	I	Pass	No
03/03/1999	500135462	PR	PR			Pass	No
01/17/1997	500135461	PR	PR			Pass	No
01/16/1997	500135460	PR	PR			Pass	No
02/14/1996	500135459	PR	PR			Pass	Yes
02/21/1995	500135458	PR	PR				

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
114746	PIT				-	STATE ST. JOHN 1-36	EI	<input checked="" type="checkbox"/>
205559	WELL	SI	03/17/2009	GW	009-05308	STATE-ST JOHN 1-36	EI	<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	farmed over with crops growing		

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

Comment: operator is now correctly identified

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

Spills:				
Type	Area	Volume	Corrective action	CA Date
Produced Water			spills noted in 1996 and 2000 inspections as near tank battery. problems with plant growth noted in NOAV issued to previous operator that have not been adequately addressed. Sample areas with lack of crop growth to N of well and in area around tank battery to determine if SAR and EC issues are still present. If analytical data indicates SAR and EC are still greater than Tbae 910-1 thresholds then develop and submit remediation plan.	03/27/2015

Multiple Spills and Releases?

Fencing/:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
PUMP JACK	SATISFACTORY			

Equipment:					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack	1	SATISFACTORY	no means of operating		
Ancillary equipment	1	SATISFACTORY	electric panel		

Venting:	
Yes/No	Comment
NO	

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205559

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 114746 Type: PIT API Number: - Status: \_\_\_\_\_ Insp. Status: EI

Facility ID: 205559 Type: WELL API Number: 009-05308 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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:

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

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

Comment:

CA:

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
photos attached show current lack of crop growth in areas impacted by spills of produced water during operations. Jones Energy stated they had applied remedial treatments to location but those have not been completely successful. See attached aerial with locations of previous samples and results indicating EC and SAR at many locations were in exceedance of thresholds in COGCC rules Table 910-1 for ag soils.	gintautp	02/11/2015

**Attached Documents**

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

Document Num	Description	URL
678300069	N from well with no crop growth as observed in past years	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548411">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548411</a>
678300070	NW from well with no crop growth as in past years	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548412">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548412</a>
678300071	N to former battery and well with no crop growth	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548413">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548413</a>

678300072	2010 sampling locations and reults	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548414">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548414</a>
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**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.)

looking N from well

02.09.2015 10:22



**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300078

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	256506	321164	GINTAUTAS, PETER	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
,	303-297-0347	sovereignenergy@aol.com	
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Pumper (Baca)
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections

**Compliance Summary:**

QtrQtr: NWSE Sec: 17 Twp: 31S Range: 44W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/20/2013	668601266	SI	TA	ACTION REQUIRED	P		No
04/18/2011	200308687	ID	TA	ACTION REQUIRED			Yes
09/09/2010	200272638	ID	TA	ACTION REQUIRED			Yes
05/05/2010	200248423	ID	TA	ACTION REQUIRED			Yes
04/22/2009	200209002	ID	TA	ACTION REQUIRED			Yes
09/20/2007	200119164	MT	SI	SATISFACTORY			No
07/10/2007	200114810	PR	SI	ACTION REQUIRED		Fail	Yes
12/13/2000	200012670	PR	PR	ACTION REQUIRED	I	Fail	Yes
02/08/2000	200003990	DG	WO	SATISFACTORY	I	Pass	No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
256506	WELL	SI	03/21/2007	GW	009-06599	COTTRELL-RUTHERFORD 2-17	EI <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	2 track through field		

**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY	corrected from 08/20/2013 inspection		
TANK LABELS/PLACARDS	SATISFACTORY	corrected from 08/20/2013 inspection		
BATTERY	SATISFACTORY	corrected from 08/20/2013 inspection		

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

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

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

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	Weeds, location where equipment had been with weeds also noted in 08/20/2013 inspection and not corrected	develop and implement weed control plan at this location	07/15/2015

**Spills:**

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

**Equipment:**

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Ancillary equipment	1	SATISFACTORY	electric panel		

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	200 BBLS	FIBERGLASS AST	37.342763,-102.404753

S/A/V:	SATISFACTORY	Comment:	open top with net in place		
Corrective Action:					Corrective Date:
<b>Paint</b>					
Condition	Adequate				
Other (Content)	_____				
Other (Capacity)	_____				
Other (Type)	_____				
<b>Berms</b>					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Inadequate	Walls Insufficient		Inadequate	
Corrective Action	no berm around tank				Corrective Date
Comment	install adequate berms around tank before use				

<b>Venting:</b>		
Yes/No	Comment	
NO		

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 256506

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 256506 Type: WELL API Number: 009-06599 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
no equipment at wellhead except for electric box and wellhead sign and riser from well	gintautp	02/23/2015

**Attached Documents**

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

Document Num	Description	URL
678300079	weeds on well pad	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555980">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555980</a>
678300080	tank with no berms	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555981">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555981</a>

**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.)

**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300081

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294081</u>	<u>321190</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Pumper (Baca)
	303-297-0347	sovereignenergy@aol.com	

**Compliance Summary:**

QtrQtr: NESW Sec: 11 Twp: 32S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/13/2012	663901946	TA	TA	<b>ACTION REQUIRED</b>	P		No
03/06/2012	663900733	TA	TA	<b>ALLEGED VIOLATION</b>	P		Yes
12/01/2010	200285560	PR	TA	<b>ACTION REQUIRED</b>			Yes
12/11/2008	200200528	PR	TA	<b>ACTION REQUIRED</b>			Yes
02/01/2008	200125703	DG	DG	SATISFACTORY			No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294081	WELL	SI	02/01/2008	GW	009-06644	DUNIVAN 1-11	EI <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**

<b>Lease Road:</b>				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY	through farm field		

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
BATTERY	SATISFACTORY	sign at battery installed to remedy 11/13/2013 inspection		
WELLHEAD	SATISFACTORY	sign at wellhead installed to remedy 11/13/2013 inspection		

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

Comment: **emergency contact information on signs at battery and at wellhead**

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	SATISFACTORY	dead weeds inside containment at tank battery as seen in previous inspections	remove weeds from battery area	06/30/2015

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

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Vertical Separator	1	SATISFACTORY	at tank battery area		

<b>Facilities:</b>					
<input type="checkbox"/> New Tank		Tank ID: _____			
Contents	#	Capacity	Type	SE GPS	
PRODUCED WATER	0			37.271110,-104.240460	
S/A/V: SATISFACTORY	Comment: <b>no tanks present inside berm or at wellhead, only a separator and pipes</b>				
Corrective Action:				Corrective Date:	

**Paint**

Condition	Adequate
-----------	----------

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate

Corrective Action		Corrective Date	
Comment			

<b>Venting:</b>		
Yes/No	Comment	
NO		

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294081

**Site Preparation:**  
 Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/AV:** \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**  
**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_  
**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: 294081 Type: WELL API Number: 009-06644 Status: SI Insp. Status: EI

**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:

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300082	wellhead and sign	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555994">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555994</a>
678300083	weeds	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555995">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555995</a>

**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.)

**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:  
02/20/2015

Document Number:  
678300084

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294082</u>	<u>321191</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
	303-297-0347	sovereignenergy@aol.com	
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County

**Compliance Summary:**

QtrQtr: NESW Sec: 12 Twp: 32S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/06/2012	663901934	TA	TA	ACTION REQUIRED			No
03/06/2012	663900732	TA	TA	ALLEGED VIOLATION	P		Yes
09/09/2010	200272470	PR	SI	ACTION REQUIRED			Yes
04/13/2010	200243377	PR	SI	ACTION REQUIRED			Yes
12/11/2008	200200573	PR	PR	ACTION REQUIRED			Yes
02/29/2008	200127626	DG	WO	SATISFACTORY			No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294082	WELL	SI	12/01/2008	GW	009-06645	BURHENN 1-12	EI <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					
<b>Lease Road:</b>					
Type	Satisfactory/Action Required	comment	Corrective Action	Date	
Access	SATISFACTORY	through irrigated field along road to center pivot			
<b>Signs/Marker:</b>					
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date	
WELLHEAD	SATISFACTORY	corrected from 11/06/2012 inspection			
TANK LABELS/PLACARDS	SATISFACTORY	NFPA and contents labels okay, volume says zero barrels largely corrected from 11/06/2012 inspection		03/23/2015	
BATTERY	SATISFACTORY	corrected from 11/06/2012 inspection			
Emergency Contact Number (S/A/V): <u>SATISFACTORY</u> <span style="float:right">Corrective Date: _____</span>					
Comment: <u>corrected from 11/06/2012 inspection</u>					
Corrective Action: _____					
<b>Good Housekeeping:</b>					
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date	
WEEDS	ACTION REQUIRED	containment area around tanks full of weeds, weeds in pumpjack as in 2012 inspection	remove weeds from containment area and pumpjack	04/13/2015	
<b>Spills:</b>					
Type	Area	Volume	Corrective action	CA Date	
<input type="checkbox"/> Multiple Spills and Releases?					
<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Ancillary equipment	1	SATISFACTORY	propane tank		
Pump Jack	1	SATISFACTORY			
Vertical Separator	1	SATISFACTORY	inside containment at battery		
<b>Facilities:</b> <input type="checkbox"/> New Tank <span style="float:right">Tank ID: _____</span>					
Contents	#	Capacity	Type	SE GPS	
PRODUCED WATER	2	100 BBLS	FIBERGLASS AST	37.265733,-102.208770	
S/A/V:	Comment: <u>tanks about 1300 feet south of wellhead</u>				
Corrective Action: _____				Corrective Date: _____	

<b>Paint</b>				
Condition	Adequate			
Other (Content)	_____			
Other (Capacity)	_____			
Other (Type)	_____			
<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Corrective Action	_____			Corrective Date
Comment	_____			

<b>Venting:</b>		
Yes/No	Comment	
NO		

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294082

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294082 Type: WELL API Number: 009-06645 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300085	weeds in pumpjack	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556001">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556001</a>
678300086	weeds in tank battery containment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556002">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556002</a>

**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.)

**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:  
02/20/2015

Document Number:  
678300087

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205624</u>	<u>320973</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections

**Compliance Summary:**

QtrQtr: <u>SENV</u>		Sec: <u>21</u>		Twp: <u>31S</u>		Range: <u>44W</u>	
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
10/20/2014	668500398	SI	SI	SATISFACTORY	P		No
08/20/2013	668601271	SI	SI	SATISFACTORY	P		No
04/18/2011	200308686	PR	PR	ACTION REQUIRED			Yes
09/09/2010	200272628	PR	SI	ACTION REQUIRED			Yes
05/05/2010	200248436	PR	PR	ACTION REQUIRED			Yes
04/22/2009	200209007	PR	PR	ACTION REQUIRED			Yes
06/13/2008	200191031	PR	PR	ACTION REQUIRED			No
07/10/2007	200114806	PR	PR	ACTION REQUIRED		Fail	Yes
12/13/2000	200012598	PR	PR	SATISFACTORY	I	Pass	No
02/23/2000	200004432	PR	PR	SATISFACTORY	I	Pass	No
03/03/1999	500135569	PR	PR			Pass	No
02/04/1998	500135568	PR	PR			Pass	No
12/26/1996	500135567	PR	PR				Yes
03/09/1995	500135566	PR	PR			Pass	Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
205624	WELL	SI	04/04/2013	GW	009-06035	LOFLIN-FEDERAL 1-21	EI	<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 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	overgrown		

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

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

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

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

Good Housekeeping:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	weeds accumulating around equipment	remove weeds from around equipment	04/07/2015
UNUSED EQUIPMENT	ACTION REQUIRED	unused separator	remove unused equipment from location	04/07/2015

Spills:				
Type	Area	Volume	Corrective action	CA Date
Produced Water	Tank		Soil sample indicates EC and SAR are in excess of threshold in Table 910-1 of rules. Develop and submit site investigation and remediation plan to address this matter	04/07/2015

Multiple Spills and Releases?

Fencing/:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK BATTERY	SATISFACTORY			
PUMP JACK	SATISFACTORY			

Equipment:					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	200 BBLS	FIBERGLASS AST	,
S/A/V:	SATISFACTORY		Comment:	
Corrective Action:				Corrective Date:

Paint

Condition	
Other (Content)	_____
Other (Capacity)	_____
Other (Type)	_____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Corrective Action	make repairs to berm if well to be brought into production and tank used			Corrective Date 04/07/2015
Comment	tank not in use at time of inspection			

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

Contents	#	Capacity	Type	SE GPS
OTHER	1			,
S/A/V:	SATISFACTORY		Comment: unused treater tower	
Corrective Action:	unused treater tower			Corrective Date:

Paint

Condition	Inadequate
Other (Content)	_____
Other (Capacity)	_____
Other (Type)	_____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Corrective Action				Corrective Date
Comment				

**Venting:**

Yes/No	Comment
NO	

**Flaring:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205624

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 205624 Type: WELL API Number: 009-06035 Status: SI Insp. Status: EI

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

<b>Sample</b>	Sample Type: <u>SOIL COMPOSITE</u>		
Time: <u>02/20/2015 09:54</u> (MM/dd/yyyy hh:mm)	GPS: Lat <u>37.331350</u>	Long <u>-102.389340</u>	
BTEX: _____	TPH: _____	Anion: _____	Captions: _____
Dissolved Methane: _____		Composition: _____	Stable Isotopes: _____
8270: _____		RCRA Metals: _____	910-Metals: _____
Other: <u>pH, SAR and EC</u>		8260: _____	
PAH: _____		Comment: <span style="color: red;">results exceed Table 910-1 thresholds for SAR and EC indicating area to south of tank probably received releases/spills of produced water when well was in production.</span>	

**Lab:**

Lab Name \_\_\_\_\_

ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300089	soil sampling location and EC and SAR results	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564579">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564579</a>

678300090	weeds and berms	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564580">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564580</a>
678300091	area sampled	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564581">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564581</a>
678300092	unused separator	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564582">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564582</a>

**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.)

Exhibit 3



area sampled

02.20.2015 09:56

**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300093

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>256507</u>	<u>321165</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County

**Compliance Summary:**

QtrQtr: NWSE Sec: 13 Twp: 31S Range: 44W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/15/2011	200304569	ID	TA	<b>ACTION REQUIRED</b>			Yes
12/01/2010	200285529	PR	SI	<b>ACTION REQUIRED</b>			Yes
03/20/2008	200128591	MT	SI	<b>ACTION REQUIRED</b>			Yes
01/23/2008	200125499	PR	SI	<b>ACTION REQUIRED</b>			Yes
12/13/2000	200012590	PR	PR	SATISFACTORY	I	Pass	No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
256507	WELL	TA	12/08/2011	GW	009-06600	THOMPSON-JEFFREY 1-13	EI	<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	grown over		

Signs/Marker:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	ACTION REQUIRED	no sign at well site	Install sign to comply with rule 210.	04/07/2015
TANK LABELS/PLACARDS	ACTION REQUIRED	no NFPA label or contents label on tank	Install sign to comply with rule 210.	04/07/2015

Emergency Contact Number (S/A/V):         ACTION         Corrective Date: 04/07/2015

Comment: no signs present at well

Corrective Action: install sign with emergency contact information

Spills:				
Type	Area	Volume	Corrective action	CA Date
Produced Water			develop and submit site investigation and remediation plan to address impacts to soils from spills/releases of produced water at tank as indicated by soil sampling conducted during inspection	04/07/2015

Multiple Spills and Releases?

**Facilities:**  New Tank Tank ID:         

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	100 BBLS	FIBERGLASS AST	,

S/A/V: ACTION REQUIRED Comment:         

Corrective Action: install and maintain netting on open top tank Corrective Date: 04/07/2015

**Paint**

Condition         

Other (Content)         

Other (Capacity)         

Other (Type)         

Berms				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Corrective Action	<u>install and maintain adequate berms around tank when brought into production</u>			Corrective Date <u>04/07/2015</u>
Comment	<u>no berms</u>			

**Venting:**

Yes/No	Comment
NO	

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 256507

**Site Preparation:**  
 Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/A/V:** \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 256507 Type: WELL API Number: 009-06600 Status: TA Insp. Status: EI

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

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 10:50 (MM/dd/yyyy hh:mm) GPS: Lat 37.344840 Long -102.320140  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: Background sample northwest of tank  
 Comment: SAR, pH and EC

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 10:43 (MM/dd/yyyy hh:mm) GPS: Lat 37.446800 Long -102.319820  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, pH and EC  
 Comment: 8 point composite around tank, SAR and EC are above thresholds in Table 910-1 of rules indicating likelihood of spills/releases of produced water from tank.

**Lab:** \_\_\_\_\_  
 Lab Name \_\_\_\_\_  
 ALS

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

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
678300094	sampling sites and results	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564623">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564623</a>
678300095	well -no sign or emergency contact and tank no berms and no labels	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564624">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564624</a>
678300096	tank with no net or labels	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564625">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564625</a>

**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.)

Exhibit 3



background  
sampling site

1 of 8 sampling  
spots around tank

**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300097

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294470</u>	<u>321194</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County

**Compliance Summary:**

QtrQtr:	<u>NENE</u>	Sec:	<u>15</u>	Twp:	<u>32S</u>	Range:	<u>43W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/13/2012	663901949	SI	SI	ALLEGED VIOLATION	P		Yes
03/06/2012	663900734	SI	TA	ALLEGED VIOLATION	P		Yes
09/09/2010	200272594	PR	SI	ACTION REQUIRED			Yes
04/13/2010	200243408	PR	SI	ACTION REQUIRED			Yes
12/11/2008	200200523	PR	PR	SATISFACTORY			Yes
05/12/2008	200189940	PR	WO	ACTION REQUIRED			Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
294470	WELL	SI	06/01/2009	GW	009-06648	BAR-B-4 RANCH 1-15	EI	<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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
TANK LABELS/PLACARDS	SATISFACTORY			
BATTERY	SATISFACTORY			

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

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

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

<b>Spills:</b>				
Type	Area	Volume	Corrective action	CA Date
Produced Water			soil analyses of site to SW of pumpjack on location indicate likelihood of produced water spill in past. Develop site investigation and remediation plan to address the values of SAR and EC that are above thresholds in Table 910-1 of rules	04/08/2015

Multiple Spills and Releases?

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Ancillary equipment	1	SATISFACTORY	propane tank		
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	100 BBLS	FIBERGLASS AST	37.265640,-102.241090

S/A/V: SATISFACTORY Comment: \_\_\_\_\_

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

**Paint**

Condition: \_\_\_\_\_

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate

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

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

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294470

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294470 Type: WELL API Number: 009-06648 Status: SI Insp. Status: EI

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

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 12:23 (MM/dd/yyyy hh:mm) GPS: Lat 37.262010 Long -102.245330  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, EC, pH  
 Comment: 4 point composite in 10 foot diameter circel to SW of pump

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 12:39 (MM/dd/yyyy hh:mm) GPS: Lat 37.265780 Long -102.241180  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, pH, Ec  
 Comment: background sample in winter wheat field

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 12:39 (MM/dd/yyyy hh:mm) GPS: Lat 37.265640 Long -102.241210  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, pH, EC  
 Comment: around edges of tank battery

**Lab:** \_\_\_\_\_  
 Lab Name \_\_\_\_\_  
 ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

<b>Storm Water:</b>						
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

**Attached Documents**

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

Document Num	Description	URL
678300098	sampling sites and results	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564766">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564766</a>
678300099	area sampled near PJ	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564767">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564767</a>

**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.)

Exhibit 3

area sampled to SW of pump jack

02.20.2015 12:20

**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300100

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294083</u>	<u>321192</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Metzger, Tom	(303) 297-0347	tmetz@aol.com	All Inspections
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County

**Compliance Summary:**

QtrQtr: NWNE Sec: 25 Twp: 32S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
12/01/2010	200285557	PR	SI	<b>ACTION REQUIRED</b>			Yes
12/11/2008	200200582	PR	PR	<b>ACTION REQUIRED</b>			Yes
05/12/2008	200189938	PR	WO	<b>ACTION REQUIRED</b>			Yes
02/01/2008	200125771	DG	WO	SATISFACTORY			No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294083	WELL	SI	02/01/2009	GW	009-06646	GIBSON 1-25	EI <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	grown over		

Signs/Marker:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
BATTERY	SATISFACTORY			
WELLHEAD	ACTION REQUIRED	no sign at wellhead	Install sign to comply with rule 210.	04/08/2015

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

Comment: at tank battery

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

Spills:				
Type	Area	Volume	Corrective action	CA Date
Produced Water			sampling results indicate spill/release of produced water to east of pumpjack on location. Develop and submit site investigation and remediation plan to mitigate impacts to soils on location	04/08/2015

Multiple Spills and Releases?

Equipment:					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Gas Meter Run	1	SATISFACTORY	at tank battery		
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	2	200 BBLs	FIBERGLASS AST	37.231990,-102.204450

S/A/V: SATISFACTORY Comment: \_\_\_\_\_

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

**Paint**

Condition: \_\_\_\_\_

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate

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

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

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294083

**Site Preparation:**  
 Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/AV:** \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294083 Type: WELL API Number: 009-06646 Status: SI Insp. Status: EI

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

**Sample** Sample Type: SOIL COMPOSITE

Time: 02/20/2015 13:15 (MM/dd/yyyy hh:mm) GPS: Lat 37.232840 Long -102.209100

BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: SAR, pH, EC

Comment: 8 point composite in 5x100 foot area with no vegetation to west of pumpjack

**Sample** Sample Type: \_\_\_\_\_

Time: 02/20/2015 13:18 (MM/dd/yyyy hh:mm) GPS: Lat 37.233010 Long -102.208770

BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: SAR, pH, EC

Comment: sampled 6 point composite to east of pumpjack with photo

**Lab:**

Lab Name \_\_\_\_\_

ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

<b>Storm Water:</b>						
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

**Attached Documents**

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

Document Num	Description	URL
678300101	sampling sites and results	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564768">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564768</a>
678300102	sampling site to east of pumpjack	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564769">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564769</a>

**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.)

Exhibit 3

sampling site to east of pumpjack

02.20.2015 13:19

**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



DE	ET	OE	ES
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Inspection Date:  
02/20/2015

Document Number:  
678300103

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>261</u>	<u>321199</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections

**Compliance Summary:**

QtrQtr: NESW Sec: 20 Twp: 32S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/13/2012	663901952	SI	SI	<b>ACTION REQUIRED</b>	I		No
12/01/2010	200285550	PR	TA	<b>ACTION REQUIRED</b>			Yes
04/13/2010	200243428	PR	SI	<b>ACTION REQUIRED</b>			Yes
12/11/2008	200200505	PR	PR	<b>ACTION REQUIRED</b>			Yes
05/12/2008	200189941	DG	DG	SATISFACTORY			No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
261	WELL	SI	01/01/2009	OW	009-06653	FULBRIGHT 1-20	EI <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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
BATTERY	SATISFACTORY			
TANK LABELS/PLACARDS	<b>ACTION REQUIRED</b>	<b>NFPA signs illegible</b>	<b>Install sign to comply with rule 210.</b>	<b>04/09/2015</b>
WELLHEAD	SATISFACTORY			

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	<b>ACTION REQUIRED</b>	<b>weeds growing inside containment area at tank battery</b>	<b>remove weeds from operations area</b>	<b>04/09/2015</b>
UNUSED EQUIPMENT	<b>ACTION REQUIRED</b>	<b>unused balance weights on ground near pumpjack</b>	<b>remove unused equipment from location</b>	<b>04/09/2015</b>

**Spills:**

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

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack	1	SATISFACTORY			
Gas Meter Run	1	SATISFACTORY	<b>at tank battery</b>		
Ancillary equipment	1	SATISFACTORY	<b>propane tank</b>		

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	200 BBLS		37.243610,-102.294870

S/A/V: SATISFACTORY Comment: \_\_\_\_\_

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

**Paint**

Condition: \_\_\_\_\_

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Sufficient	Base Sufficient	Adequate

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

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

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 261

**Site Preparation:**  
 Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/AV:** \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 261 Type: WELL API Number: 009-06653 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300104	sampling sites	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564901">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564901</a>
678300105	tank	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564902">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564902</a>
678300106	weights on ground	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564903">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564903</a>

**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.)

**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:  
02/20/2015

Document Number:  
678300107

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205748</u>	<u>321002</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections

**Compliance Summary:**

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/13/2012	663901953	SI	TA	ACTION REQUIRED	F		No
10/06/2010	200276885	PR	SI	ACTION REQUIRED			Yes
08/07/2009	200216237	PR	SI	ACTION REQUIRED			Yes
04/03/2008	200129939	PR	SI	ACTION REQUIRED			Yes
01/02/2001	200013096	PR	PR	SATISFACTORY	I	Pass	No
02/07/2000	200003787	PR	PR	SATISFACTORY	I	Pass	No
03/04/1999	500135786	PR	PR			Fail	Yes
02/13/1998	500135789	PR	PR			Fail	Yes
01/28/1997	500135785	PR	PR			Pass	No
03/24/1995	500135788	PR	PR			Pass	Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205748	WELL	SI	02/01/2008	GW	009-06159	COGBURN 1	EI <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	corn field		

**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			

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

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

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

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED	counterweights on ground	remove unused equipment from location	04/10/2015

**Spills:**

Type	Area	Volume	Corrective action	CA Date
Produced Water			soil sampling results indicate likelihood of produced water spill/release in are where tank used to be on location. Develop and submit site investigation and remediation plan to mitigate the impacts to soils (SAR) at this location	04/10/2015

Multiple Spills and Releases?

**Fencing/:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
PUMP JACK	SATISFACTORY			

**Equipment:**

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Gas Meter Run	1	SATISFACTORY			
Pump Jack	1	SATISFACTORY			

**Venting:**

Yes/No	Comment
NO	

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205748

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 205748 Type: WELL API Number: 009-06159 Status: SI Insp. Status: EI

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

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 14:51 (MM/dd/yyyy hh:mm) GPS: Lat 37.225694 Long -102.290677  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, pH, Ec  
 Comment: composite of 6 samples around area where tank had been located to SW of pumpjack

**Sample** Sample Type: SOIL COMPOSITE  
 Time: 02/20/2015 14:54 (MM/dd/yyyy hh:mm) GPS: Lat 37.225490 Long -102.290590  
 BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_  
 Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_  
 8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_  
 Other: SAR, pH, EC  
 Comment: background sample in corn field to south of well

**Lab:** \_\_\_\_\_  
 Lab Name \_\_\_\_\_  
 ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

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
678300108	sampling sites and results	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564904">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564904</a>
678300109	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564905">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564905</a>
678300110	tank area sampling location	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564906">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564906</a>

**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.)

sampling locations



**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:  
03/09/2015

Document Number:  
678300115

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	50	321198	GINTAUTAS, PETER	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections

**Compliance Summary:**

QtrQtr: SWNW Sec: 24 Twp: 32S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/06/2012	663900735	SI	TA	ALLEGED VIOLATION	P		Yes
12/01/2010	200285547	PR	SI	ACTION REQUIRED			Yes
12/11/2008	200200576	PR	SI	ACTION REQUIRED			Yes
05/12/2008	200189936	PR	WO	ACTION REQUIRED			Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
50	WELL	SI	03/01/2008	LO	009-06652	SHARP GIBSON 1-24	EI	<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**

<b>Lease Road:</b>				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY	through field		

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
BATTERY	SATISFACTORY			

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

Comment: corrected since last inspection

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	<b>ACTION REQUIRED</b>	see photos	remove unsued equipment from location	04/13/2015

<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
PUMP JACK	<b>ACTION REQUIRED</b>	fence pieces on ground at well	repair fence or remove pieces from ground and location	04/13/2015

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER				37.251040,-102.217480

S/A/V: SATISFACTORY Comment: tanks removed with only vertical separator remaining at tank battery location

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

**Paint**

Condition: \_\_\_\_\_

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

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

Comment	
---------	--

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 50

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 50 Type: WELL API Number: 009-06652 Status: SI Insp. Status: EI

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:

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? 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: \_\_\_\_\_

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

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

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

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

**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
678300116	at well	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566120">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566120</a>
678300117	at old TB	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566121">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566121</a>

**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.)

**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:  
03/09/2015

Document Number:  
678300118

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294472</u>	<u>321196</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Metzger, Tom	(303) 297-0347	tsmetz@aol.com	All Inspections
Crane, Rocky	(719) 529-0682	rockycrane@yahoo.com	All inspections Baca County

**Compliance Summary:**

QtrQtr: NWSE Sec: 7 Twp: 32S Range: 42W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/06/2012	663901933	SI	SI	<b>ACTION REQUIRED</b>			No
03/06/2012	663900731	SI	TA	<b>ALLEGED VIOLATION</b>	P		Yes
04/07/2011	200307156	PR	SI	<b>ACTION REQUIRED</b>			Yes
09/09/2010	200272469	PR	PR	<b>ACTION REQUIRED</b>			Yes
04/13/2010	200243367	PR	SI	<b>ACTION REQUIRED</b>			Yes
12/11/2008	200200595	PR	PR	<b>ACTION REQUIRED</b>			Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
294472	WELL	SI	03/01/2009	GW	009-06650	WRIGHT 1-7	EI	<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					
<b>Lease Road:</b>					
Type	Satisfactory/Action Required	comment	Corrective Action	Date	
Access	SATISFACTORY	through center pivot irrigated field			
<b>Signs/Marker:</b>					
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date	
BATTERY	SATISFACTORY				
TANK LABELS/PLACARDS	ACTION REQUIRED	volume of tanks not labeled	Install sign to comply with rule 210.	04/13/2015	
WELLHEAD	SATISFACTORY		corrected since last inspection		
Emergency Contact Number (S/A/V):		SATISFACTORY		Corrective Date: _____	
Comment: _____					
Corrective Action: _____					
<b>Good Housekeeping:</b>					
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date	
UNUSED EQUIPMENT	ACTION REQUIRED	see photo	remove unused equipment from location	04/13/2015	
<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	
PUMP JACK	SATISFACTORY				
<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack	1	SATISFACTORY			
Vertical Separator	1	SATISFACTORY	at tank battery		
<b>Facilities:</b> <input type="checkbox"/> New Tank      Tank ID: _____					
Contents	#	Capacity	Type	SE GPS	
PRODUCED WATER	2	100 BBLS	FIBERGLASS AST	37.269730,-102.186300	
S/A/V:	SATISFACTORY		Comment: battery beside county road		
Corrective Action:			Corrective Date:		
<b>Paint</b>					
Condition	_____				
Other (Content)	_____				
Other (Capacity)	_____				
Other (Type)	_____				
<b>Berms</b>					

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Corrective Action				Corrective Date
Comment				

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294472

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294472 Type: WELL API Number: 009-06650 Status: SI Insp. Status: EI

**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:

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

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

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

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

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

**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
678300119	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566122">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566122</a>

**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.)

**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:  
03/12/2015

Document Number:  
678300122

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205764</u>	<u>321010</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/27/2014	668602410	SI	SI	SATISFACTORY	P		No
03/15/2011	200304560	PR	PR	ACTION REQUIRED			Yes
08/31/2010	200269024	PR	PR	ACTION REQUIRED			Yes
11/13/2009	200222517	PR	PR	ACTION REQUIRED			Yes
12/29/2008	200201447	PR	PR	SATISFACTORY			No
11/10/2007	200099198	PR	PR	ACTION REQUIRED		Fail	Yes
12/14/2000	200012578	PR	PR	SATISFACTORY	I	Pass	No
02/07/2000	200003575	PR	PR	SATISFACTORY	I	Pass	No
03/08/1999	500135828	PR	PR			Pass	No
02/05/1998	500135827	PR	PR			Pass	No
01/24/1997	500135826	PR	PR				Yes
07/19/1996	500135825	PR	PR			Pass	No
03/22/1995	500135824	PR	PR			Pass	Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205764	WELL	SI	03/19/2014	GW	009-06176	STATE OF COLORADO 1-16	EI

**Equipment:**

Location Inventory



Other (Type) _____				
<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Corrective Action	berms around tank must be repaired if well is put into production with use of tank			Corrective Date 04/15/2015
Comment				

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205764

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 205764 Type: WELL API Number: 009-06176 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
last production reported December 2013. A shut in well shall pass an MIT within 2 years of initial shut in date (rule 326.b) which will be due by December 2015 if well is not produced before then.	gintautp	03/13/2015

**Attached Documents**

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

Document Num	Description	URL
678300122	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568807">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568807</a>
678300123	sign not visible	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568802">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568802</a>
678300124	NFPA and tank volume signs needed	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568803">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568803</a>
678300125	tank with inadequate berms	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568804">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568804</a>

**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.)

**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:  
03/12/2015

Document Number:  
678300129

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205724</u>	<u>320996</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/06/2012	663901927	SI	TA	ALLEGED VIOLATION	P		Yes
04/12/2011	200308355	MT	SI	ACTION REQUIRED			Yes
03/15/2011	200302828	PR	SI	ACTION REQUIRED			Yes
08/09/2010	200266492	PR	SI	ACTION REQUIRED			Yes
04/03/2008	200129930	PR	PR	SATISFACTORY			No
01/03/2001	200012990	PR	PR	SATISFACTORY	I	Pass	No
01/18/2000	200003495	PR	PR	SATISFACTORY	I	Pass	No
03/11/1999	500135738	PR	PR			Pass	No
02/13/1998	500135737	PR	PR			Fail	Yes
06/26/1996	500135736	PR	PR			Fail	Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
114691	PIT		09/23/1999		-	MURRAY "C" 1	<input type="checkbox"/>
205724	WELL	SI	06/16/2009	GW	009-06135	MURRAY 'C' 1	EI <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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED		Install sign to comply with rule 210.	04/17/2015

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED		remove unused equipment from location	04/17/2015

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

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Gas Meter Run		SATISFACTORY			

<b>Facilities:</b>					
<input type="checkbox"/> New Tank		Tank ID: _____			
Contents	#	Capacity	Type	SE GPS	
PRODUCED WATER	1	100 BBLS	FIBERGLASS AST		
S/A/V:	ACTION REQUIRED		Comment: on location		
Corrective Action:	maintain adeqaute wildlife screening on open top tank			Corrective Date:	04/17/2015

**Paint**

Condition	_____
Other (Content)	_____
Other (Capacity)	_____
Other (Type)	_____

<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Corrective Action	repair and maintain berms around tank before well put inot production with use of tank			Corrective Date: 04/17/2015

Comment	
---------	--

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205724

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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:

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Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

--

**Facility**

Facility ID: 205724 Type: WELL API Number: 009-06135 Status: SI Insp. Status: EI

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:

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? 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: \_\_\_\_\_

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

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

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

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

**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
678300132	berms and labels	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568983">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568983</a>
678300133	wildlife screening	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568984">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568984</a>
678300134	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568985">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568985</a>

**ACTION REQUIRED**

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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.)

**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:  
03/12/2015

Document Number:  
678300130

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>206169</u>	<u>321157</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

QtrQtr: NENW Sec: 32 Twp: 31S Range: 42W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/15/2011	200302834	PR	PR	<b>ACTION REQUIRED</b>			Yes
11/12/2009	200222377	PR	PR	<b>ACTION REQUIRED</b>			Yes
01/02/2008	200124176	PR	PR	<b>ACTION REQUIRED</b>			Yes
01/10/2001	200013414	PR	PR	SATISFACTORY	I	Pass	No
01/18/2000	200003488	PR	PA	SATISFACTORY	I	Pass	No
03/08/1999	500136698	PR	PR			Pass	No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
206169	WELL	SI	01/16/2013	GW	009-06585	MURRAY 'A' 2	EI	<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**

Emergency Contact Number (S/A/V): \_\_\_\_\_

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

Comment: **no sign as well is apparently plugged and abandoned**

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

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

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 206169

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 206169 Type: WELL API Number: 009-06585 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

Overall Interim Reclamation \_\_\_\_\_

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

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

Reminder: \_\_\_\_\_

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

Well plugged Pass Pit mouse/rat holes, cellars backfilled Pass

Debris removed Pass No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded Pass Contoured In Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed Fail Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage Fail

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

Comment: no attempt at revegetation observed. Presumably will be planted in next crop year

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

Overall Final Reclamation Fail 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
FORM 6 (prior) on record and notice of intent to plug on record as planned to commence on 01/25/2015. Well is apparently plugged with equipment removed but Form 6 subsequent has not been received according to check on 13March2015. A form 6 (subsequent) is required to be submitted within 30 days of abandonment. Submit Form 6 subsequent and additional plugging records as required by rule 311.b	gintautp	03/13/2015

**Attached Documents**

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

Document Num	Description	URL
678300131	location on 12 March 2015	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568854">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568854</a>

**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.)

**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:  
03/09/2015

Document Number:  
678300142

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205983</u>	<u>321083</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/13/2012	663901954	SI	TA	ACTION REQUIRED	P		No
10/06/2010	200276873	PM	SI	ACTION REQUIRED			Yes
05/12/2008	200189932	MT	TA	ACTION REQUIRED			Yes
04/03/2008	200129938	PR	SI	ACTION REQUIRED			Yes
01/02/2001	200013097	PR	PR	ACTION REQUIRED	I	Fail	Yes
02/07/2000	200003786	PR	PR	SATISFACTORY	I	Pass	No
03/04/1999	500136309	PR	PR			Fail	Yes
02/13/1998	500136312	PR	PR			Fail	Yes
01/28/1997	500136308	PR	PR			Pass	No
03/24/1995	500136307	PR	PR			Pass	Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205983	WELL	SI	10/22/2008	GW	009-06398	COGBURN-WECO A 1	EI

**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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY	corrected from previous inspection		

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	weeds on location and along lease road and were noted in previous inspection with actions required in previous inspection by 02/13/2013	remove and control weeds on location and along lease road	04/27/2015

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

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Horizontal Separator	1	SATISFACTORY			
Gas Meter Run	1	SATISFACTORY			

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205983

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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:

**Environmental**

**Spills/Releases:**

Type of Spill: WATER Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

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

Corrective Action: **determine if SAR and EC are elevated above thresholds and submit data to COGCC** Date: **04/27/2015**

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: \_\_\_\_\_ Other \_\_\_\_\_

**Sample** Sample Type: SOIL COMPOSITE

Time: 03/09/2015 10.07 (MM/dd/yyyy hh:mm) GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: SAR, pH and EC

Comment: **EC is more than 2 time background at location but less than threshold in Table 910-1, SAR is elevated at area near old separator but less than threshold**

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**Pits:**  NO SURFACE INDICATION OF PIT

**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.)

**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



DE	ET	OE	ES
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Inspection Date:  
03/09/2015

Document Number:  
678300143

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294086</u>	<u>321193</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bseglc.com	all inspections

**Compliance Summary:**

QtrQtr:	<u>SENV</u>	Sec:	<u>19</u>	Twp:	<u>32S</u>	Range:	<u>42W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/06/2012	663900736	SI	SI	ALLEGED VIOLATION	P		Yes
12/01/2010	200285553	PR	TA	ACTION REQUIRED			Yes
12/11/2008	200200579	PR	PR	ACTION REQUIRED			Yes
05/12/2008	200189937	PR	WO	ACTION REQUIRED			Yes

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294086	WELL	SI	10/01/2008	OW	009-06647	GIBSON 1-19	EI <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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED	volume of tank not specified contents and NFPA label added since last inspection	Install sign to comply with rule 210.	04/27/2015
WELLHEAD	SATISFACTORY			

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

Comment: corrected since previous inspection

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED	unused rods and engine cover on ground near pumpjack as shown on attached photo	remove unused equipment from location	04/27/2015

**Spills:**

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

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Gas Meter Run	1	SATISFACTORY			
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	2	100 BBLS	FIBERGLASS AST	37.250930,-102.204200

S/A/V: \_\_\_\_\_ Comment: \_\_\_\_\_

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

**Paint**

Condition: \_\_\_\_\_

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Sufficient	Inadequate

Corrective Action: maintain adequate berms when well is in production Corrective Date: 04/27/2015

Comment: see attached photo

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294086

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294086 Type: WELL API Number: 009-06647 Status: SI Insp. Status: EI

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300144	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577494">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577494</a>
678300145	berms	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577495">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577495</a>

**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.)

**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:  
03/09/2015

Document Number:  
678300146

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>294490</u>	<u>321197</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number: 10383

Name of Operator: SOVEREIGN OPERATING COMPANY LLC

Address: 475 17TH STREET #1200

City: DENVER State: CO Zip: 80202

- 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
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections

**Compliance Summary:**

QtrQtr: SWSE Sec: 16 Twp: 32S Range: 42W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
02/20/2015	668501072	SI	SI	SATISFACTORY			No
12/11/2008	200200598	PR	SI	<b>ACTION REQUIRED</b>			Yes
03/19/2008	200128598	DG	DG	SATISFACTORY			No

**Inspector Comment:**

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294490	WELL	SI	07/17/2008	GW	009-06651	ROBBINS 1-16	EI <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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED	unused pipe on ground as shown on attached photo	remove unused equipment from locations	04/27/2015

<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
PUMP JACK	SATISFACTORY	steel panels		

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Pump Jack					

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 294490

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 294490 Type: WELL API Number: 009-06651 Status: SI Insp. Status: EI

**Environmental**

**Spills/Releases:**

Type of Spill: WATER Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: unreported spill/release of produced water in area where tank had been

Corrective Action: submit site investigation and remediation plan to address salt impacts to soils Date: 04/27/2015

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: \_\_\_\_\_ Other \_\_\_\_\_

<b>Sample</b>	Sample Type: <u>SOIL COMPOSITE</u>		
Time: <u>03/09/2015 12:55</u> (MM/dd/yyyy hh:mm)	GPS: Lat <u>37.254710</u>	Long <u>-102.158610</u>	
BTEX: _____	TPH: _____	Anion: _____	Captions: _____
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____	8260: _____
8270: _____	RCRA Metals: _____	910-Metals: _____	PAH: _____
Other: <u>SAR, pH and EC</u>			
Comment: <u>SAR and EC elevated above thresholds in table 910-1</u>			

**Lab:**

Lab Name \_\_\_\_\_

ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300147	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577506">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577506</a>

**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.)

**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



DE	ET	OE	ES
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Inspection Date:  
03/12/2015

Document Number:  
678300148

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205761</u>	<u>321007</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections

**Compliance Summary:**

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/05/2012	663901919	SI	TA	SATISFACTORY	P		No
03/15/2011	200302844	PR	TA	ACTION REQUIRED			Yes
12/23/2010	200290095	MT	SI	ACTION REQUIRED			Yes
11/17/2010	200284539	PR	TA	ACTION REQUIRED			Yes
08/09/2010	200266502	PR	TA	ACTION REQUIRED			Yes
01/23/2008	200125562	PR	PR	ACTION REQUIRED			Yes
01/18/2000	200003124	PR	PR	SATISFACTORY	P	Pass	No
03/11/1999	500135815	PR	PR			Pass	No
02/13/1998	500135814	PR	PR			Fail	Yes
01/24/1997	500135813	PR	PR				No
06/26/1996	500135812	PR	PR			Fail	Yes

**Inspector Comment:**

\_\_\_\_\_

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205761	WELL	SI	11/22/2010	GW	009-06173	STATE 267-S 1	EI <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**

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
TANK LABELS/PLACARDS	SATISFACTORY			

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

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

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

<b>Good Housekeeping:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	weeds around equipment	remove weeds and control weeds	04/29/2015

<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
TANK BATTERY	ACTION REQUIRED	fencing around wellhead and nearby tank with sections laying on gorund	re-install panels or remove from location	04/29/2015

<b>Equipment:</b>					
Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Ancillary equipment	1	SATISFACTORY	electric panel		
Pump Jack	1	SATISFACTORY			

<b>Facilities:</b>						
<input type="checkbox"/> New Tank		Tank ID: _____				
Contents	#	Capacity	Type	SE GPS		
PRODUCED WATER	1	200 BBLS	FIBERGLASS AST			
S/A/V:	Comment: <span style="color: red;">beside well and pumpjack on location</span>					
Corrective Action:				Corrective Date:		

<b>Paint</b>	
Condition	_____
Other (Content)	_____

Other (Capacity) \_\_\_\_\_  
 Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Sufficient	Inadequate
Corrective Action	repair and maintain berms if well is put back into production			Corrective Date 04/29/2015
Comment	noted in previous inspections			

<b>Venting:</b>	
Yes/No	Comment
NO	

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205761

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 205761 Type: WELL API Number: 009-06173 Status: SI Insp. Status: EI

**Idle Well**

Purpose:  Shut In  Temporarily Abandoned Reminder: \_\_\_\_\_

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

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

Comment: needs MIT by end of 2015

**Environmental**

**Spills/Releases:**

Type of Spill: WATER Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: unreported spills/releases of produced water near to SW of well and tank and near separator

Corrective Action: submit site investigation and remediation plan to address salt impacts Date: 04/29/2015

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: \_\_\_\_\_ Other \_\_\_\_\_

**Sample** Sample Type: SOIL COMPOSITE

Time: 03/12/2015 12:44 (MM/dd/yyyy hh:mm) GPS: Lat 37.341190 Long -102.159880

BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: SAR, pH and EC

Comment: SAR and EC above thresholds in Table 910-1

**Sample** Sample Type: SOIL COMPOSITE

Time: 03/12/2015 12:46 (MM/dd/yyyy hh:mm) GPS: Lat 37.340930 Long -102.159860

BTEX: \_\_\_\_\_ TPH: \_\_\_\_\_ Anion: \_\_\_\_\_ Captions: \_\_\_\_\_ General Chemistry: \_\_\_\_\_

Dissolved Methane: \_\_\_\_\_ Composition: \_\_\_\_\_ Stable Isotopes: \_\_\_\_\_ 8260: \_\_\_\_\_

8270: \_\_\_\_\_ RCRA Metals: \_\_\_\_\_ 910-Metals: \_\_\_\_\_ PAH: \_\_\_\_\_

Other: SAR, pH and EC

Comment: SAR and EC above thresholds in Table 910-1

**Lab:**

Lab Name \_\_\_\_\_

ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

<b>Storm Water:</b>						
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

**Attached Documents**

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

Document Num	Description	URL
678300149	unused equip.	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577523">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577523</a>

**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.)

**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:  
03/12/2015

Document Number:  
678300153

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>206170</u>	<u>321158</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

QtrQtr:	<u>NENE</u>	Sec:	<u>29</u>	Twp:	<u>31S</u>	Range:	<u>42W</u>
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/06/2012	663901925	SI	TA	SATISFACTORY			No
07/09/2012	663901314	SI	TA	<b>ACTION REQUIRED</b>	P		No
04/07/2011	200307018	MT	TA	SATISFACTORY			No
04/07/2011	200307149	ID	TA	<b>ACTION REQUIRED</b>			Yes
03/15/2011	200302837	PM	SI	<b>ACTION REQUIRED</b>			Yes
08/09/2010	200266495	PR	SI	<b>ACTION REQUIRED</b>			Yes
11/12/2009	200222371	PR	SI	<b>ACTION REQUIRED</b>			Yes
01/02/2008	200124178	PR	PR	SATISFACTORY			No
01/10/2001	200013417	PR	PR	SATISFACTORY	I	Pass	No
01/18/2000	200003486	PR	PA	SATISFACTORY	I	Pass	No
03/11/1999	500136699	SR	PR			Pass	No

**Inspector Comment:**

\_\_\_\_\_

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
206170	WELL	SI	05/18/2009	GW	009-06586	MURRAY C 2	SI <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	through field		

**Signs/Marker:**

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

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

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

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

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED	unused pipe on ground as shown on attached photo	remove unused equipment from location	04/29/2015

**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
PUMP JACK	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	200 BBLs	FIBERGLASS AST	37.323970,-102.170320

S/A/V: \_\_\_\_\_ Comment: open-top tank with wildlife netting

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

**Paint**

Condition	_____
Other (Content)	_____
Other (Capacity)	_____

Other (Type) _____				
<b>Berms</b>				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Sufficient	Inadequate
Corrective Action	install and maintain adequate berms around tank when well placed into production			Corrective Date 04/29/2015
Comment				

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 206170

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 206170 Type: WELL API Number: 009-06586 Status: SI Insp. Status: SI

**Idle Well**

Purpose:  Shut In  Temporarily Abandoned Reminder: \_\_\_\_\_

S/AV: SATISFACTORY CA Date: \_\_\_\_\_

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

Comment: production equipment removed from location. last MIT in 2011

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

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300154	berms	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577671">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577671</a>
678300155	unused equipment	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577672">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577672</a>

**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.)

**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



DE	ET	OE	ES
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Inspection Date:  
03/12/2015

Document Number:  
678300156

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>205729</u>	<u>320997</u>	<u>GINTAUTAS, PETER</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>10383</u>
Name of Operator:	<u>SOVEREIGN OPERATING COMPANY LLC</u>
Address:	<u>475 17TH STREET #1200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</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
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections

**Compliance Summary:**

QtrQtr: <u>SENW</u>		Sec: <u>29</u>		Twp: <u>31S</u>		Range: <u>42W</u>	
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
04/05/2011	200307017	MT	TA	SATISFACTORY			No
04/05/2011	200307045	ID	TA	ACTION REQUIRED			Yes
03/15/2011	200302836	PR	SI	ACTION REQUIRED			Yes
11/12/2009	200222374	PR	PR	ACTION REQUIRED			Yes
01/02/2008	200124177	PR	PR	ACTION REQUIRED			Yes
01/10/2001	200013415	PR	PR	SATISFACTORY	I	Pass	No
01/18/2000	200003487	PR	PA	SATISFACTORY	I	Pass	No
03/08/1999	500135746	PR	PR			Fail	Yes
02/13/1998	500135748	PR	PR			Fail	Yes
01/24/1997	500135745	PR	PR				No
06/26/1996	500135744	PR	PR			Fail	Yes

**Inspector Comment:**

\_\_\_\_\_

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
205729	WELL	SI	04/14/2009	GW	009-06140	MOORE 'C' 1	EI

**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	through irrigated field		

**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	ACTION REQUIRED	no sign at wellhead only at tank area to east	Install sign to comply with rule 210.	04/29/2015
TANK LABELS/PLACARDS	ACTION REQUIRED	no NFPA placard on tank as on attached photo	Install sign to comply with rule 210.	04/29/2015
BATTERY	SATISFACTORY			

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

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

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

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WEEDS	ACTION REQUIRED	see attached photo near tank and shed	remove and control weeds near tank battery and county road	04/29/2015

**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
PUMP JACK	ACTION REQUIRED	fencing in pieces and laying on ground	repair or remove fencing	04/29/2015

**Equipment:**

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Gas Meter Run	1	SATISFACTORY	meter in shed near tank		
Pump Jack	1	SATISFACTORY			

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

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	200 BBLS	FIBERGLASS AST	37.317080,-102.178920

S/A/V: SATISFACTORY	Comment: open top tank with wildlife netting
---------------------	--

Corrective Action:	Corrective Date:
--------------------	------------------

**Paint**

Condition	
-----------	--

Other (Content) \_\_\_\_\_

Other (Capacity) \_\_\_\_\_

Other (Type) \_\_\_\_\_

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Sufficient	Inadequate
Corrective Action	repair and maintaine berms when well placed inot production			Corrective Date 04/29/2015
Comment	see attached photo			

**Venting:**

Yes/No	Comment
NO	

**Flaring:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 205729

**Site Preparation:**

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

**S/AV:** \_\_\_\_\_

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

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**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: 205729 Type: WELL API Number: 009-06140 Status: SI Insp. Status: EI

**Environmental**

**Spills/Releases:**

Type of Spill: WATER Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: soils analyses indicate salt impacts in soils near tank and shed

Corrective Action: develop and submit site investigation and remediation plan Date: 04/29/2015

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: \_\_\_\_\_ Other \_\_\_\_\_

<b>Sample</b>	Sample Type: <u>SOIL COMPOSITE</u>		
Time: <u>03/12/2015 13:35</u> (MM/dd/yyyy hh:mm)	GPS: Lat <u>37.317080</u>	Long <u>-102.178920</u>	
BTEX: _____	TPH: _____	Anion: _____	Captions: _____ General Chemistry: _____
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____	8260: _____
8270: _____	RCRA Metals: _____	910-Metals: _____	PAH: _____
Other: <u>SAR, pH and EC</u>			
Comment: <span style="color: red;">SAR and EC are above thresholds in Table 910-1</span>			

**Lab:**

Lab Name \_\_\_\_\_

ALS \_\_\_\_\_

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? \_\_\_\_\_ 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: \_\_\_\_\_

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

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

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

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

**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
678300157	berms and label	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577821">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577821</a>

678300158	weeds	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577822">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577822</a>
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**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.)

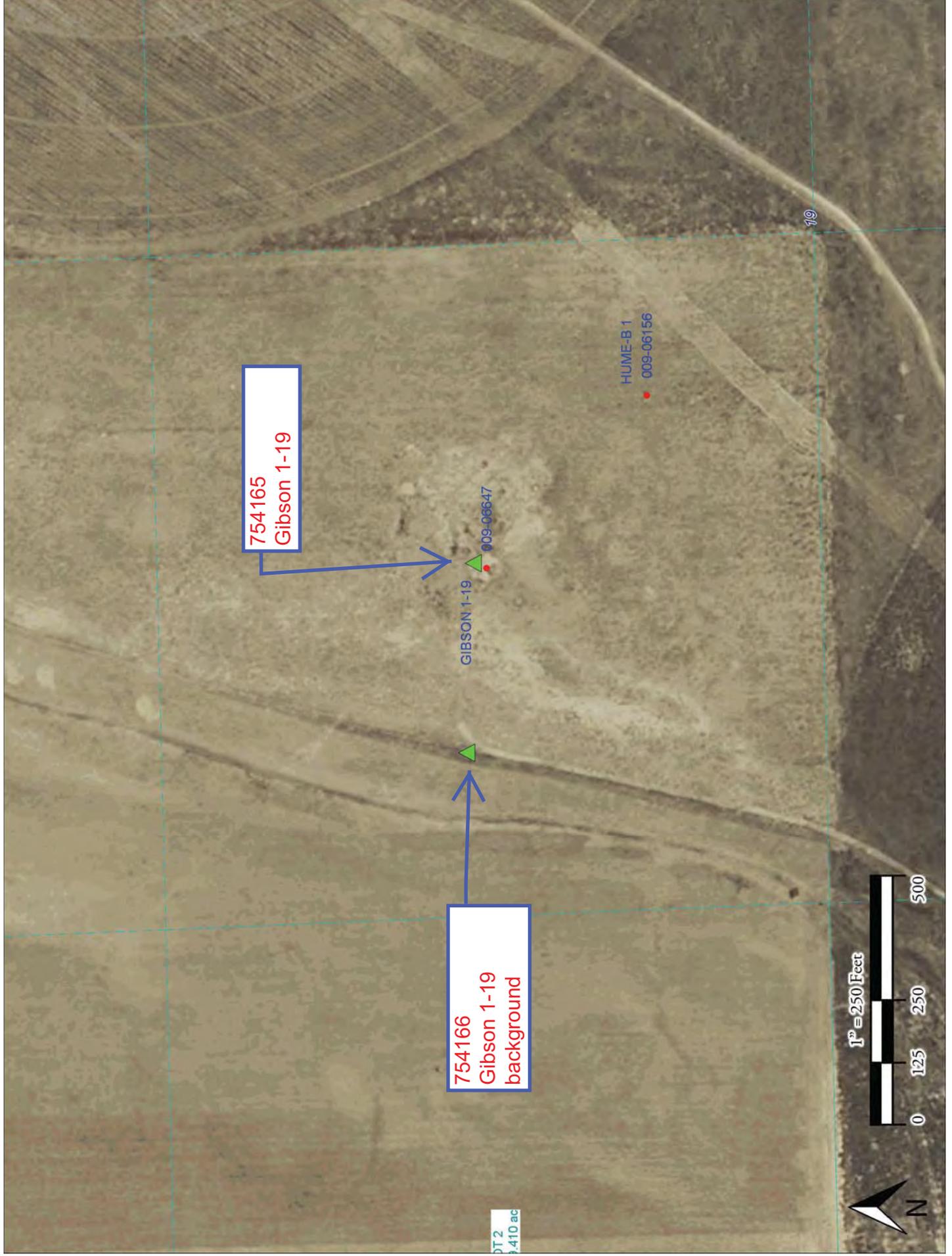
## Exhibit 4

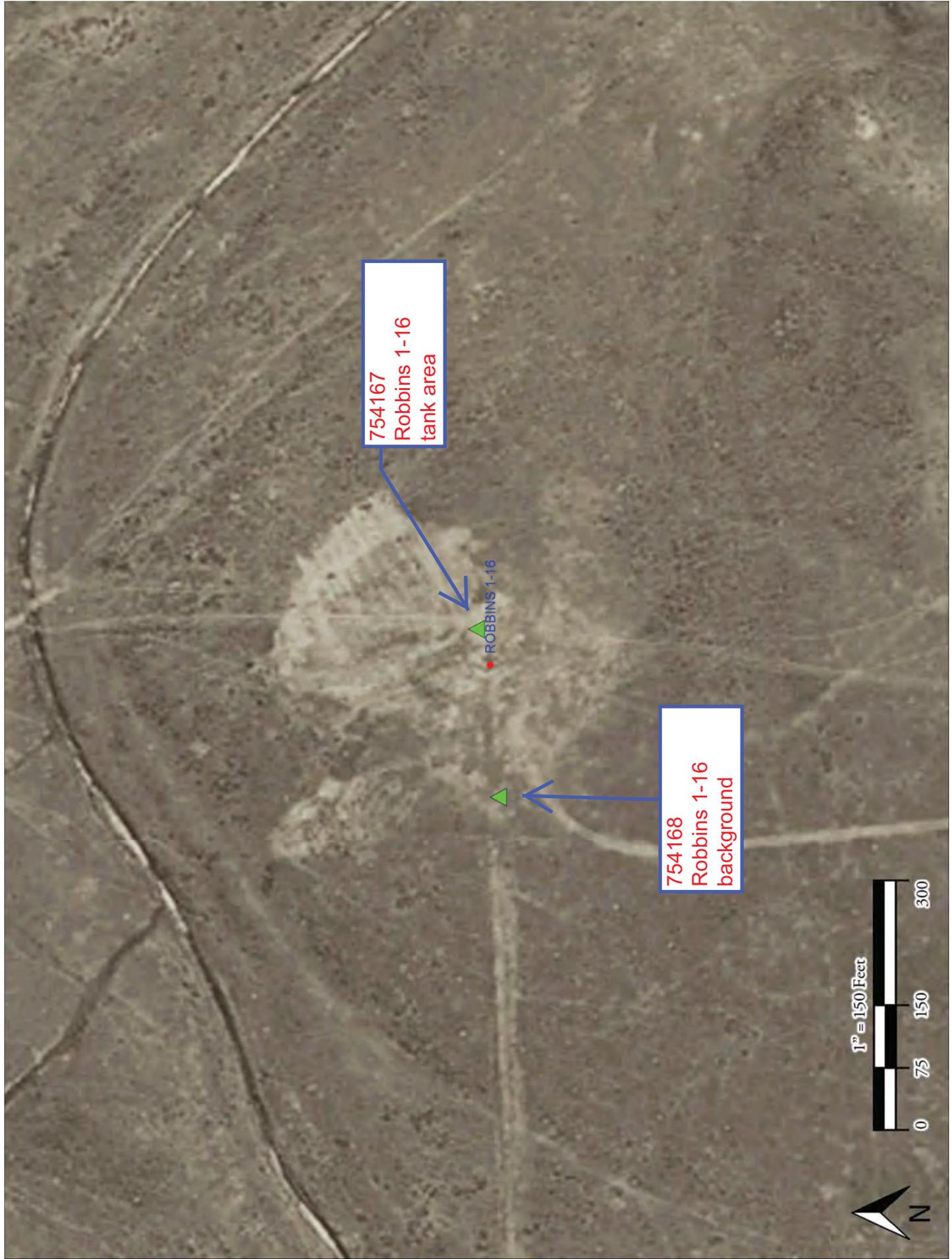
ENVDB Facility #	Facility # and Name	Sample Date & Time	Latitude	Longitude	pH	ELECTRICAL	SODIUM	
						CONDUCTIVITY @ SATURATION	ADSORPTION RATIO	
						SU	µmhos/cm	no units
						6-9	4000µmhos or 2X background	Table 910-1 <12 threshold
754098	321192 Gibson 1-25 west	2015-02-20T13:15:00	37.23284	-102.2091	7.9		320	0.34
754099	321192 Gibson 1-25 east	2015-02-20T13:18:00	37.23301	-102.20877	7.6		13000	7.5
754100	321192 Gibson 1-25 background	2015-02-20T13:31:00	37.23284	-102.20412	7.9		2600	0.31
754101	321199 Fullbright 1-20 East	2015-02-20T14:24:00	37.241542	-102.28805	8.1		490	0.35
754102	321199 Fulbright 1-20 background	2015-02-20T14:32:00	37.24187	-102.28889	8.1		460	0.33
754103	321002 Cogburn 1 tank	2015-02-20T14:51:00	37.225694	-102.290677	8.6		3400	21
754104	321002 Cogburn 1 background	2015-02-20T14:54:00	37.22549	-102.29059	8.1		310	0.35
754105	320965 State St John 1-36 tank	2015-02-20T15:33:00	37.39255	-102.42577	7.3		100000	80
754106	320973 Loflin Federal 1-21 south of tanks	2015-02-20T09:54:00	37.33135	-102.38934	7.7		31000	37
754107	321165 Thompson-Jeffrey 1-13 tank area	2015-02-20T10:43:00	37.34468	-102.31982	7.5		59000	44
754108	321165 Thompson-Jeffrey 1-13 background	2015-02-20T10:50:00	37.34484	-102.32014	7.5		1400	2.9
754109	321194 Bar-B-4 Ranch 1-15	2015-02-20T12:23:00	37.26201	-102.24533	7.9		9400	17
754110	321194 Bar-B-4 Ranch tank battery	2015-02-20T12:35:00	37.26564	-102.24121	8.4		490	0.79
754111	321194 Bar-B-4 Ranch 1-15 background	2015-02-20T12:39:00	37.26578	-102.24118	7.2		520	0.31
754162	321083 Cogburn-Weco A 1 tank	2015-03-09T10:07:00	37.2171	-102.30182	8.3		1800	9.1
754163	321083 Cogburn-Weco A 1 background	2015-03-09T10:15:00	37.21625	-102.30185	7.9		450	0.3
754164	321083 Cogburn-Weco A 1	2015-03-09T10:18:00	37.21663	-102.30182	7.7		780	2.8
754165	321193 Gibson 1-19	2015-03-09T11:19:00	37.24575	-102.19757	9		1400	9
754166	321193 Gibson 1-19 background	2015-03-09T11:27:00	37.24582	-102.19887	7.4		530	0.31
754167	321197 Robbins 1-16 tank area	2015-03-09T12:55:00	37.25471	-102.15861	7.5		20000	20
754168	321197 Robbins 1-16 background	2015-03-09T12:55:00	37.25465	-102.1593	7.2		560	0.93
754171	321007 State 267-S 1	2015-03-12T12:44:00	37.34119	-102.15988	7.6		31000	32
754172	321007 State 267-S 1 separator	2015-03-12T12:46:00	37.34093	-102.15986	8		5100	15
754173	321007 State 267-S 1 background	2015-03-12T12:52:00	37.34122	-102.15895	6.9		650	0.26
754174	321158 Murray C 2 tank battery	2015-03-12T13:15:00	37.32384	-102.17038	7.8		1400	0.77
754175	321158 Murray C 2 background	2015-03-12T13:35:00	37.32423	-102.17033	7.6		900	0.33
754176	320997 Moore C 1 tank battery	2015-03-12T13:19:00	37.31708	-102.17892	7.6		24000	19

indicate results not within Table 910-1 thresholds

indicate results elevated over background









received 03/18/2015  
Project 8983

# Inorganics Case Narrative

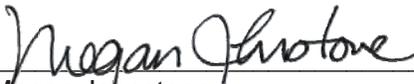
## Colorado Oil & Gas Conservation Commission Baca Soils

Work Order Number: 1503146

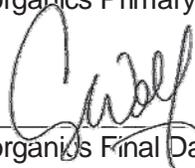
1. This report consists of 7 soil samples.
2. The samples were received cool and intact by ALS on 03/11/15.
3. The samples were analyzed following USDA60 procedures for the current revision of the following SOP and method:

<u>Analyte</u>	<u>Method</u>	<u>SOP #</u>
Paste pH	USDA60	810 Draft
Electrical conductivity	USDA60	810 Draft
Sodium Adsorption Ratio	USDA60	810 Draft

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

  
 \_\_\_\_\_  
 Megan Johnstone  
 Inorganics Primary Data Reviewer

3/18/15  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Inorganics Final Data Reviewer

3/18/15  
 \_\_\_\_\_  
 Date



**Inorganic Data Reporting Qualifiers**

The following qualifiers are used by the laboratory when reporting results of inorganic analyses.

- Concentration qualifier -- If the analyte was analyzed for but not detected a "U" is entered.
- QC qualifier -- Specified entries and their meanings are as follows:
  - N - Spiked sample recovery not within control limits.
  - \* - Duplicate analysis (relative percent difference) not within control limits.
  - Z - Calibration spike recovery not within control limits.

# ALS Environmental -- FC

## Sample Number(s) Cross-Reference Table

**OrderNum:** 1503146

**Client Name:** Colorado Oil & Gas Conservation Commission

**Client Project Name:** Baca Soils

**Client Project Number:**

**Client PO Number:** PHAA061114PHA-04

Client Sample Number	Lab Sample Number	COC Number	Matrix	Date Collected	Time Collected
321083 Tank Cogburn Weco AI	1503146-1		SOIL	09-Mar-15	10:07
321083 Back Cogburn Weco AI	1503146-2		SOIL	09-Mar-15	10:15
321083 Cogburn Weco AI	1503146-3		SOIL	09-Mar-15	10:18
321193 Gibson 1-19	1503146-4		SOIL	09-Mar-15	11:19
321193 Back Gibson 1-19	1503146-5		SOIL	09-Mar-15	11:27
321197 Tank Robbins 1-16	1503146-6		SOIL	09-Mar-15	12:55
321197 Back Robbins 1-16	1503146-7		SOIL	09-Mar-15	12:59
321083 Tank Cogburn Weco AI	1503146-8		LEACHAT	09-Mar-15	10:07
321083 Back Cogburn Weco AI	1503146-9		LEACHAT	09-Mar-15	10:15
321083 Cogburn Weco AI	1503146-10		LEACHAT	09-Mar-15	10:15
321193 Gibson 1-19	1503146-11		LEACHAT	09-Mar-15	11:19
321193 Back Gibson 1-19	1503146-12		LEACHAT	09-Mar-15	11:27
321197 Tank Robbins 1-16	1503146-13		LEACHAT	09-Mar-15	12:55
321197 Back Robbins 1-16	1503146-14		LEACHAT	09-Mar-15	12:59



**ALS Laboratory Group**  
 225 Commerce Drive, Fort Collins, Colorado 80524  
 TF: (800) 443-1511 PH: (970) 490-1511 FX: (970) 490-1522

**Chain-of-Custody**

Form 2027e

PROJECT NAME PROJECT No.	Blaca Scis		SAMPLER SITE ID	PAG		WORKORDER #	1503140
COMPANY NAME	Coca O.H Gas Cons. Com.		EDD FORMAT			PAGE	1 of 1
SEND REPORT TO	Peter Gintantars		PURCHASE ORDER			DISPOSAL	By Lab or Return to Client
ADDRESS	PO Box 108		BILL TO COMPANY			DATE	10 March 2015
CITY / STATE / ZIP	Torrado CO 81082		INVOICE ATTN TO			TURNAROUND	5 weeks
PHONE	719 446 3091		ADDRESS				
FAX			CITY / STATE / ZIP				
E-MAIL	peter.gintantars@stelocons.com		PHONE				
			FAX				
			E-MAIL				

Lab ID	Field ID	Matrix	Sample Date	Sample Time	# Bottles	Pres.	QC
1	321083 Tank Cagburn Waco AL 5	S	9 March 15	10:07	1		
2	321083 Back Cagburn Waco AL 5	S	9 March 15	10:15	1		
3	321083 Cagburn Waco AL 5	S	9 March 15	10:14	1		
4	321193 Gibson 1-19	S	9 March 15	11:19	1		
5	321193 Back Gibson 1-19	S	9 March 15	11:27	1		
6	321197 Tank Robbins F-16	S	9 March 15	12:55	1		
7	321197 Back Robbins F-16	S	9 March 15	12:59	1		

\*Time Zone (Circle): EST CST MST PST Matrix: O = oil S = soil NS = non-soil solid W = water L = liquid E = extract F = filter  
 For metals or anions, please detail analytes below.

Comments:

QC PACKAGE (check below)  
 LEVEL II (Standard QC)  
 LEVEL III (Std QC + forms)  
 LEVEL IV (Std QC + forms + raw data)

Preservative Key: 1-HCl 2-HNO3 3-H2SO4 4-NaOH 5-NaHSO4 7-Other 8-4 degrees C 9-5035

RELINQUISHED BY	SIGNATURE	PRINTED NAME	DATE	TIME
RECEIVED BY	<i>Peter Gintantars</i>	Peter Gintantars	10 March 15	12:50
RELINQUISHED BY	<i>Erin Peterson</i>	Erin Peterson	3/11/15	10:15
RECEIVED BY				
RELINQUISHED BY				
RECEIVED BY				



ALS Environmental - Fort Collins  
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCC  
Project Manager: ARW

Workorder No: 1503146  
Initials: ECP Date: 3/11/15

1. Does this project require any special handling in addition to standard ALS procedures?		YES	<input checked="" type="radio"/> NO
2. Are custody seals on shipping containers intact?	NONE	<input checked="" type="radio"/> YES	NO
3. Are Custody seals on sample containers intact?	<input checked="" type="radio"/> NONE	YES	NO
4. Is there a COC (Chain-of-Custody) present or other representative documents?		<input checked="" type="radio"/> YES	NO
5. Are the COC and bottle labels complete and legible?		<input checked="" type="radio"/> YES	NO
6. Is the COC in agreement with samples received? (IDs, dates, times, no. of samples, no. of containers, matrix, requested analyses, etc.)		<input checked="" type="radio"/> YES	NO
7. Were airbills / shipping documents present and/or removable?	DROP OFF	<input checked="" type="radio"/> YES	NO
8. Are all aqueous samples requiring preservation preserved correctly? (excluding volatiles)	<input checked="" type="radio"/> N/A	YES	NO
9. Are all aqueous non-preserved samples pH 4-9?	<input checked="" type="radio"/> N/A	YES	NO
10. Is there sufficient sample for the requested analyses?		<input checked="" type="radio"/> YES	NO
11. Were all samples placed in the proper containers for the requested analyses?		<input checked="" type="radio"/> YES	NO
12. Are all samples within holding times for the requested analyses?		<input checked="" type="radio"/> YES	NO
13. Were all sample containers received intact? (not broken or leaking, etc.)		<input checked="" type="radio"/> YES	NO
14. Are all samples requiring no headspace (VOC, GRO, RSK/MEE, Rx CN/S, radon) headspace free? Size of bubble: ___ < green pea ___ > green pea	<input checked="" type="radio"/> N/A	YES	NO
15. Do any water samples contain sediment? Amount Amount of sediment: ___ dusting ___ moderate ___ heavy	<input checked="" type="radio"/> N/A	YES	NO
16. Were the samples shipped on ice?		YES	<input checked="" type="radio"/> NO
17. Were cooler temperatures measured at 0.1-6.0°C? IR gun used*: #2 #4		RAD ONLY	YES <input checked="" type="radio"/> NO
Cooler #: <u>1</u>			
Temperature (°C): <u>AMB</u>			
No. of custody seals on cooler: <u>1</u>			
External µR/hr reading: <u>11</u>			
Background µR/hr reading: <u>11</u>			
Were external µR/hr readings ≤ two times background and within DOT acceptance criteria? <input checked="" type="radio"/> YES <input type="radio"/> NO / <input type="radio"/> NA (If no, see Form 008.)			

Additional Information: PROVIDE DETAILS BELOW FOR A NO RESPONSE TO ANY QUESTION ABOVE, EXCEPT #1 AND #16.

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If applicable, was the client contacted? YES / NO /  NA Contact: Curry Date/Time: 3/11/14  
Project Manager Signature / Date: Curry 3/11/14

1503146

From: 0719 000 3001  
Postmaster  
Care, US & Can. Dest. Comm.  
210 Oceanview RD  
Tulsa, OK 74102



Origin ID: 0100A



J000000000

Bill To: 0719 000 1511  
Amy Wolf  
ALS Laboratory Group  
225 COMMERCE DR  
FORT COLLINS, CO 80524

BILL BENDER

Ship Date: 03/09/11  
Origin: 03 US  
CID: 000000000000000000

Delivery Address Bar Code



Net #  
Business #  
PO #  
Dept #

Business Country and territory

FORT COLLINS, CO 80524

WED - 11 MAR 10:30A  
PRIORITY OVERNIGHT

TIME 7730 8030 0111



80524  
CO-US  
DEN

72 FTCA



5274879624

RT 614  
FZ  
1 10:30  
A 0111 03.11

**PASTE PH**  
**Method USDA60**  
**Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca Soils  
**Work Order Number:** 1503146      **Final Volume:** 20 ml  
**Reporting Basis:** As Received      **Matrix:** SOIL  
**Prep Method:** NONE      **Result Units:** pH  
**Analyst:** Alex J. Devonald

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321083 Tank Cogburn Weco	1503146-1	03/09/2015	03/17/2015	03/17/2015	N/A	1	8.3	0.1		20 ml
321083 Back Cogburn Weco	1503146-2	03/09/2015	03/17/2015	03/17/2015	N/A	1	7.9	0.1		20 ml
321083 Cogburn Weco AI	1503146-3	03/09/2015	03/17/2015	03/17/2015	N/A	1	7.7	0.1		20 ml
321193 Gibson 1-19	1503146-4	03/09/2015	03/17/2015	03/17/2015	N/A	1	9	0.1		20 ml
321193 Back Gibson 1-19	1503146-5	03/09/2015	03/17/2015	03/17/2015	N/A	1	7.4	0.1		20 ml
321197 Tank Robbins 1-16	1503146-6	03/09/2015	03/17/2015	03/17/2015	N/A	1	7.5	0.1		20 ml
321197 Back Robbins 1-16	1503146-7	03/09/2015	03/17/2015	03/17/2015	N/A	1	7.2	0.1		20 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

**Data Package ID:** *pH1503146-1*

**ELECTRICAL CONDUCTIVITY @ SATURATION****Method USDA60****Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca Soils  
**Work Order Number:** 1503146      **Final Volume:** 45 ml  
**Reporting Basis:** As Received      **Matrix:** LEACHATE  
**Prep Method:** NONE      **Result Units:** umhos/cm  
**Analyst:** Alex J. Devonald

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321083 Tank Cogburn Weco	1503146-8	03/09/2015	03/17/2015	03/17/2015	N/A	10	1800	1		45 ml
321083 Back Cogburn Weco	1503146-9	03/09/2015	03/17/2015	03/17/2015	N/A	10	450	1		45 ml
321083 Cogburn Weco AI	1503146-10	03/09/2015	03/17/2015	03/17/2015	N/A	10	780	1		45 ml
321193 Gibson 1-19	1503146-11	03/09/2015	03/17/2015	03/17/2015	N/A	10	1400	1		45 ml
321193 Back Gibson 1-19	1503146-12	03/09/2015	03/17/2015	03/17/2015	N/A	10	530	1		45 ml
321197 Tank Robbins 1-16	1503146-13	03/09/2015	03/17/2015	03/17/2015	N/A	10	20000	1		45 ml
321197 Back Robbins 1-16	1503146-14	03/09/2015	03/17/2015	03/17/2015	N/A	10	560	1		45 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

**Data Package ID:** *sc1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321083 Tank Cogburn Wec	<b>Sample Matrix:</b> LEACHATE	<b>Prep Batch:</b> IP150313-30	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1503146-8	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150313-30-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 09-Mar-15	<b>Run ID:</b> IT150316-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 12-Mar-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 16-Mar-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150316A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	43	10		
7439-95-4	MAGNESIUM	10	0.00027	10	U	
7440-23-5	SODIUM	10	250	10		
	SODIUM ADSORPTION RATIO	10	9.1	0.54	S	

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321083 Back Cogburn Wec
Lab ID:	1503146-9

Sample Matrix: LEACHATE  
 % Moisture: N/A  
 Date Collected: 09-Mar-15  
 Date Extracted: 12-Mar-15  
 Date Analyzed: 16-Mar-15  
 Prep Method: SW3010 Rev A

Prep Batch: IP150313-30  
 QCBatchID: IP150313-30-1  
 Run ID: IT150316-1A1  
 Cleanup: NONE  
 Basis: As Received  
 File Name: 150316A.

Analyst: Steve Workman  
 Sample Aliquot: 5 ML  
 Final Volume: 5 ML  
 Result Units: MG/L  
 Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	67	10		
7439-95-4	MAGNESIUM	10	0.00027	10	U	
7440-23-5	SODIUM	10	0.00049	10	U	
	SODIUM ADSORPTION RATIO	10	0.3	0.54	S	

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321083 Cogburn Weco Al	<b>Sample Matrix:</b> LEACHATE	<b>Prep Batch:</b> IP150313-30	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1503146-10	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150313-30-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 09-Mar-15	<b>Run ID:</b> IT150316-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 12-Mar-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 16-Mar-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150316A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	42	10		
7439-95-4	MAGNESIUM	10	0.00027	10	U	
7440-23-5	SODIUM	10	78	10		
	SODIUM ADSORPTION RATIO	10	2.8	0.54	S	

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321193 Gibson 1-19
Lab ID:	1503146-11

Sample Matrix: LEACHATE

% Moisture: N/A

Date Collected: 09-Mar-15

Date Extracted: 12-Mar-15

Date Analyzed: 16-Mar-15

Prep Method: SW3010 Rev A

Prep Batch: IP150313-30

QCBatchID: IP150313-30-1

Run ID: IT150316-1A1

Cleanup: NONE

Basis: As Received

File Name: 150316A.

Analyst: Steve Workman

Sample Aliquot: 5 ML

Final Volume: 5 ML

Result Units: MG/L

Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	13	10		
7439-95-4	MAGNESIUM	10	18	10		
7440-23-5	SODIUM	10	210	10		
	SODIUM ADSORPTION RATIO	10	9	0.54		

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321193 Back Gibson 1-19
Lab ID:	1503146-12

Sample Matrix: LEACHATE

% Moisture: N/A

Date Collected: 09-Mar-15

Date Extracted: 12-Mar-15

Date Analyzed: 16-Mar-15

Prep Method: SW3010 Rev A

Prep Batch: IP150313-30

QCBatchID: IP150313-30-1

Run ID: IT150316-1A1

Cleanup: NONE

Basis: As Received

File Name: 150316A.

Analyst: Steve Workman

Sample Aliquot: 5 ML

Final Volume: 5 ML

Result Units: MG/L

Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	64	10		
7439-95-4	MAGNESIUM	10	0.00027	10	U	
7440-23-5	SODIUM	10	0.00049	10	U	
	SODIUM ADSORPTION RATIO	10	0.31	0.54	S	

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321197 Tank Robbins 1-16
Lab ID:	1503146-13

**Sample Matrix:** LEACHATE  
**% Moisture:** N/A  
**Date Collected:** 09-Mar-15  
**Date Extracted:** 12-Mar-15  
**Date Analyzed:** 16-Mar-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150313-30  
**QCBatchID:** IP150313-30-1  
**Run ID:** IT150316-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150316A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	930	10		
7439-95-4	MAGNESIUM	10	100	10		
7440-23-5	SODIUM	100	2400	100		
	SODIUM ADSORPTION RATIO	100	20	5.4		

Data Package ID: *it1503146-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503146

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321197 Back Robbins 1-16
Lab ID:	1503146-14

**Sample Matrix:** LEACHATE  
**% Moisture:** N/A  
**Date Collected:** 09-Mar-15  
**Date Extracted:** 12-Mar-15  
**Date Analyzed:** 16-Mar-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150313-30  
**QCBatchID:** IP150313-30-1  
**Run ID:** IT150316-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150316A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	28	10		
7439-95-4	MAGNESIUM	10	0.00027	10	U	
7440-23-5	SODIUM	10	23	10		
	SODIUM ADSORPTION RATIO	10	0.93	0.54	S	

Data Package ID: *it1503146-1*



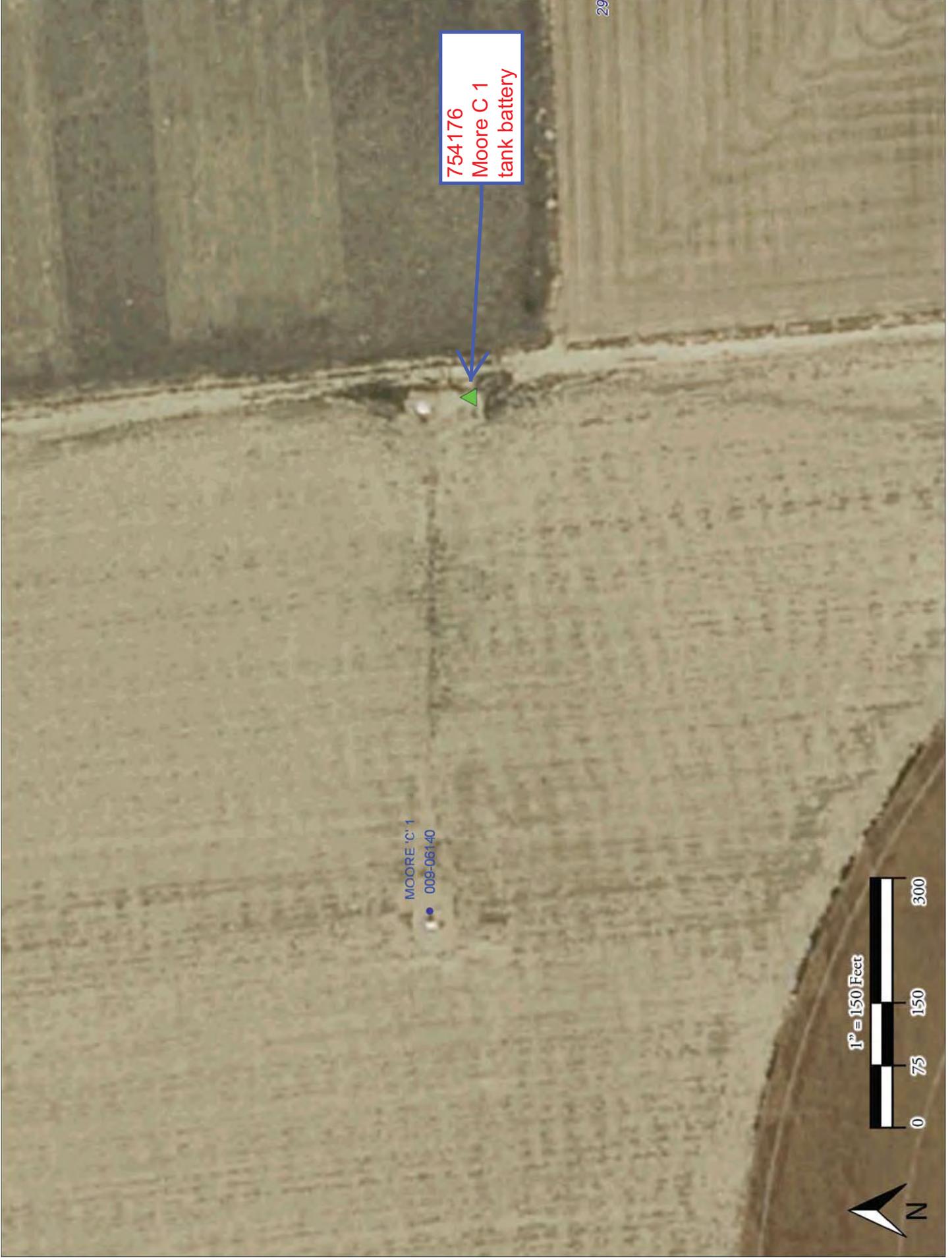


754175  
Murray C 2  
background

754174  
Murray C 2  
tank battery

MURRAY C 2  
009-06586







received 03/24/2015  
Project 8983

# Inorganics Case Narrative

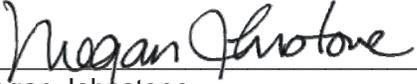
## Colorado Oil & Gas Conservation Commission Baca County Soils

Work Order Number: 1503305

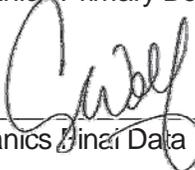
1. This report consists of 6 soil samples.
2. The samples were received cool and intact by ALS on 03/17/15.
3. The samples were analyzed following USDA60 procedures for the current revision of the following SOP and method:

<u>Analyte</u>	<u>Method</u>	<u>SOP #</u>
Paste pH	USDA60	810 Draft
Electrical conductivity	USDA60	810 Draft
Sodium Adsorption Ratio	USDA60	810 Draft

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

  
 \_\_\_\_\_  
 Megan Johnstone  
 Inorganics Primary Data Reviewer

3/24/15  
 Date

  
 \_\_\_\_\_  
 Inorganics Primary Data Reviewer

3/24/15  
 Date



**Inorganic Data Reporting Qualifiers**

The following qualifiers are used by the laboratory when reporting results of inorganic analyses.

- Concentration qualifier -- If the analyte was analyzed for but not detected a "U" is entered.
- QC qualifier -- Specified entries and their meanings are as follows:
  - N - Spiked sample recovery not within control limits.
  - \* - Duplicate analysis (relative percent difference) not within control limits.
  - Z - Calibration spike recovery not within control limits.

# ALS Environmental -- FC

## Sample Number(s) Cross-Reference Table

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**OrderNum:** 1503305

**Client Name:** Colorado Oil & Gas Conservation Commission

**Client Project Name:** Baca County Soils

**Client Project Number:**

**Client PO Number:** PHAA061114PHA-04

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Client Sample Number	Lab Sample Number	COC Number	Matrix	Date Collected	Time Collected
321007 State 267-S1	1503305-1		SOIL	12-Mar-15	12:44
321007 Sep. State 267-S1	1503305-2		SOIL	12-Mar-15	12:46
321007 Back State 267-S1	1503305-3		SOIL	12-Mar-15	12:52
321158 TB Murray C2	1503305-4		SOIL	12-Mar-15	13:15
321158 Back Murray C2	1503305-5		SOIL	12-Mar-15	13:19
320997 TB Moore C1	1503305-6		SOIL	12-Mar-15	13:35
321007 State 267-S1	1503305-7		LEACHAT	12-Mar-15	12:44
321007 Sep. State 267-S1	1503305-8		LEACHAT	12-Mar-15	12:46
321007 Back State 267-S1	1503305-9		LEACHAT	12-Mar-15	12:52
321158 TB Murray C2	1503305-10		LEACHAT	12-Mar-15	13:15
321158 Back Murray C2	1503305-11		LEACHAT	12-Mar-15	13:19
320997 TB Moore C1	1503305-12		LEACHAT	12-Mar-15	13:35



**ALS Laboratory Group**

225 Commerce Drive, Fort Collins, Colorado 80524  
 TF: (800) 443-1511 PH: (970) 480-1511 FX: (970) 490-1522

**Chain-of-Custody**

Form 202r6

WORKORDER # **1503305**

Exhibit 5

PAGE **1** of **1**

DATE **16 March 2015**

TURNAROUND **5 days**

By Lab or Return to Client

PROJECT NAME **Bala Lindy Sails**

PROJECT No.

COMPANY NAME **Cole, O. + Thos Cons. Co., Ltd.**

SEND REPORT TO **Peter Gintantus**

ADDRESS **PO Box 100**

CITY / STATE / ZIP **Tanahual CO 81062**

PHONE **719-846-3091**

FAX

E-MAIL **pete.gintantus@stater.co.uk**

SAMPLER SITE ID

EDD FORMAT

PURCHASE ORDER

BILL TO COMPANY

INVOICE ATTN TO

ADDRESS

CITY / STATE / ZIP

PHONE

FAX

DATE

TURNAROUND

By Lab or Return to Client

Matrix

Field ID

Sample Date

Sample Time

# Bottles

Pres.

QC

Lab ID

1 321007 Stale 207-S 1

2 321007 Sap. Stale 207-S 1

3 321007 Back Stale 207-S 1

4 321156 TB Mussy C 2

5 321156 Back Mussy C 2

6 320997 TB Mussy C-1

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

2 13 March 12:40

3 13 March 12:52

4 12 March 13:15

5 12 March 13:19

6 12 March 13:35

1 X X X

2 X X X

3 X X X

4 ✓ ✓ ✓

5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

2 13 March 12:40

3 13 March 12:52

4 12 March 13:15

5 12 March 13:19

6 12 March 13:35

1 X X X

2 X X X

3 X X X

4 ✓ ✓ ✓

5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

2 13 March 12:40

3 13 March 12:52

4 12 March 13:15

5 12 March 13:19

6 12 March 13:35

1 X X X

2 X X X

3 X X X

4 ✓ ✓ ✓

5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

2 13 March 12:40

3 13 March 12:52

4 12 March 13:15

5 12 March 13:19

6 12 March 13:35

1 X X X

2 X X X

3 X X X

4 ✓ ✓ ✓

5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

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3 13 March 12:52

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5 12 March 13:19

6 12 March 13:35

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2 X X X

3 X X X

4 ✓ ✓ ✓

5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

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5 12 March 13:19

6 12 March 13:35

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3 X X X

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5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

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Matrix

Sample Date

Sample Time

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Sample Time

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Sample Date

Sample Time

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Pres.

QC

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2 X X X

3 X X X

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5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

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2 13 March 12:40

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6 12 March 13:35

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2 X X X

3 X X X

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5 ✓ ✓ ✓

6 ✓ ✓ ✓

Matrix

Sample Date

Sample Time

# Bottles

Pres.

QC

1 12 March 12:14

2 13 March 12:40

3 13 March 12:52

4 12 March 13:15

5 12 March 13:19

6 12 March 13:35

1 X X X

2 X X X



ALS Environmental - Fort Collins  
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCC  
Project Manager: ARW

Workorder No: 1503305  
Initials: ECP Date: 3/17/15

1. Does this project require any special handling in addition to standard ALS procedures?		YES	<input checked="" type="radio"/> NO
2. Are custody seals on shipping containers intact?	NONE	<input checked="" type="radio"/> YES	NO
3. Are Custody seals on sample containers intact?	<input checked="" type="radio"/> NONE	YES	NO
4. Is there a COC (Chain-of-Custody) present or other representative documents?		<input checked="" type="radio"/> YES	NO
5. Are the COC and bottle labels complete and legible?		<input checked="" type="radio"/> YES	NO
6. Is the COC in agreement with samples received? (IDs, dates, times, no. of samples, no. of containers, matrix, requested analyses, etc.)		<input checked="" type="radio"/> YES	NO
7. Were airbills / shipping documents present and/or removable?	DROP OFF	<input checked="" type="radio"/> YES	NO
8. Are all aqueous samples requiring preservation preserved correctly? (excluding volatiles)	<input checked="" type="radio"/> N/A	YES	NO
9. Are all aqueous non-preserved samples pH 4-9?	<input checked="" type="radio"/> N/A	YES	NO
10. Is there sufficient sample for the requested analyses?		<input checked="" type="radio"/> YES	NO
11. Were all samples placed in the proper containers for the requested analyses?		<input checked="" type="radio"/> YES	NO
12. Are all samples within holding times for the requested analyses?		<input checked="" type="radio"/> YES	NO
13. Were all sample containers received intact? (not broken or leaking, etc.)		<input checked="" type="radio"/> YES	NO
14. Are all samples requiring no headspace (VOC, GRO, RSK/MEE, Rx CN/S, radon) headspace free? Size of bubble: ___ < green pea ___ > green pea	<input checked="" type="radio"/> N/A	YES	NO
15. Do any water samples contain sediment? Amount Amount of sediment: ___ dusting ___ moderate ___ heavy	<input checked="" type="radio"/> N/A	YES	NO
16. Were the samples shipped on ice?		YES	<input checked="" type="radio"/> NO
17. Were cooler temperatures measured at 0.1-6.0°C? IR gun used*: #2 #4 RAD ONLY		YES	<input checked="" type="radio"/> NO
Cooler #: <u>1</u>			
Temperature (°C): <u>AMB</u>			
No. of custody seals on cooler: <u>1</u>			
External µR/hr reading: <u>8</u>			
Background µR/hr reading: <u>11</u>			
Were external µR/hr readings ≤ two times background and within DOT acceptance criteria? <input checked="" type="radio"/> YES / NO / NA (If no. see Form 008.)			

Additional Information: PROVIDE DETAILS BELOW FOR A NO RESPONSE TO ANY QUESTION ABOVE, EXCEPT #1 AND #16.

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If applicable, was the client contacted? YES / NO /  NA Contact: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Project Manager Signature / Date: *Arw* 3/17/15

1503305

RT 614 10:30 A 1300 03/17

81

Ship Date: 10/06/15  
Address: 2111 B  
CITY: 60140-0170



Delivery Address Bar Code

Unit #  
Number of  
PO #  
Digits

From: (719) 444-3001  
Peter Glendon  
Oak, CR & Cass Co., Co.  
213 Commerce RD  
Timberland, CO 81002

Origin ID: PUMA



JK510222200

WILL REISNER

SHIP TO: 6014 0170

Army Wolf  
ALS Laboratory Group  
225 COMMERCE DR

FORT COLLINS, CO 80524

TUE - 17 MAR 10:30A  
PRIORITY OVERNIGHT

7731 3306 7444

UNIT

90524  
COUS  
DEN

72 FTCA



974600000000



# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

Field ID:	321007 State 267-S1
Lab ID:	1503305-7

Sample Matrix: LEACHATE

% Moisture: N/A

Date Collected: 12-Mar-15

Date Extracted: 23-Mar-15

Date Analyzed: 23-Mar-15

Prep Method: SW3010 Rev A

Prep Batch: IP150323-1

QCBatchID: IP150323-1-1

Run ID: IT150323-1A1

Cleanup: NONE

Basis: As Received

File Name: 150323A.

Analyst: Steve Workman

Sample Aliquot: 5 ML

Final Volume: 5 ML

Result Units: MG/L

Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	950	10		
7439-95-4	MAGNESIUM	10	200	10		
7440-23-5	SODIUM	100	4200	100		
	SODIUM ADSORPTION RATIO	100	32	5.4		

Data Package ID: *it1503305-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

Field ID:	321007 Sep. State 267-S1
Lab ID:	1503305-8

Sample Matrix: LEACHATE  
 % Moisture: N/A  
 Date Collected: 12-Mar-15  
 Date Extracted: 23-Mar-15  
 Date Analyzed: 23-Mar-15  
 Prep Method: SW3010 Rev A

Prep Batch: IP150323-1  
 QCBatchID: IP150323-1-1  
 Run ID: IT150323-1A1  
 Cleanup: NONE  
 Basis: As Received  
 File Name: 150323A.

Analyst: Steve Workman  
 Sample Aliquot: 5 ML  
 Final Volume: 5 ML  
 Result Units: MG/L  
 Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	140	10		
7439-95-4	MAGNESIUM	10	24	10		
7440-23-5	SODIUM	10	750	10		
	SODIUM ADSORPTION RATIO	10	15	0.54		

Data Package ID: *it1503305-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

Field ID:	321007 Back State 267-S1
Lab ID:	1503305-9

Sample Matrix: LEACHATE  
 % Moisture: N/A  
 Date Collected: 12-Mar-15  
 Date Extracted: 23-Mar-15  
 Date Analyzed: 23-Mar-15  
 Prep Method: SW3010 Rev A

Prep Batch: IP150323-1  
 QCBatchID: IP150323-1-1  
 Run ID: IT150323-1A1  
 Cleanup: NONE  
 Basis: As Received  
 File Name: 150323A.

Analyst: Steve Workman  
 Sample Aliquot: 5 ML  
 Final Volume: 5 ML  
 Result Units: MG/L  
 Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	61	10		
7439-95-4	MAGNESIUM	10	38	10		
7440-23-5	SODIUM	10	11	10		
	SODIUM ADSORPTION RATIO	10	0.26	0.54		

Data Package ID: *it1503305-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

<b>Field ID:</b> 321158 TB Murray C2	<b>Sample Matrix:</b> LEACHATE	<b>Prep Batch:</b> IP150323-1	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1503305-10	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150323-1-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 12-Mar-15	<b>Run ID:</b> IT150323-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 23-Mar-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 23-Mar-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150323A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	110	10		
7439-95-4	MAGNESIUM	10	33	10		
7440-23-5	SODIUM	10	36	10		
	SODIUM ADSORPTION RATIO	10	0.77	0.54		

Data Package ID: *it1503305-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

Field ID:	321158 Back Murray C2
Lab ID:	1503305-11

**Sample Matrix:** LEACHATE  
**% Moisture:** N/A  
**Date Collected:** 12-Mar-15  
**Date Extracted:** 23-Mar-15  
**Date Analyzed:** 23-Mar-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150323-1  
**QCBatchID:** IP150323-1-1  
**Run ID:** IT150323-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150323A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	50	10		
7439-95-4	MAGNESIUM	10	12	10		
7440-23-5	SODIUM	10	0.00049	10	U	
	SODIUM ADSORPTION RATIO	10	0.33	0.54	S	

Data Package ID: *it1503305-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca County Soils

Field ID:	320997 TB Moore C1
Lab ID:	1503305-12

**Sample Matrix:** LEACHATE  
**% Moisture:** N/A  
**Date Collected:** 12-Mar-15  
**Date Extracted:** 23-Mar-15  
**Date Analyzed:** 23-Mar-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150323-1  
**QCBatchID:** IP150323-1-1  
**Run ID:** IT150323-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150323A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	970	10		
7439-95-4	MAGNESIUM	10	280	10		
7440-23-5	SODIUM	100	2600	100		
	SODIUM ADSORPTION RATIO	100	19	5.4		

Data Package ID: *it1503305-1*

**PASTE PH**  
**Method USDA60**  
**Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca County Soils  
**Work Order Number:** 1503305      **Final Volume:** 20 ml  
**Reporting Basis:** As Received      **Matrix:** SOIL  
**Prep Method:** NONE      **Result Units:** pH  
**Analyst:** Alex J. Devonald

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321007 State 267-S1	1503305-1	03/12/2015	03/23/2015	03/23/2015	N/A	1	7.6	0.1		20 ml
321007 Sep. State 267-S1	1503305-2	03/12/2015	03/23/2015	03/23/2015	N/A	1	8	0.1		20 ml
321007 Back State 267-S1	1503305-3	03/12/2015	03/23/2015	03/23/2015	N/A	1	6.9	0.1		20 ml
321158 TB Murray C2	1503305-4	03/12/2015	03/23/2015	03/23/2015	N/A	1	7.8	0.1		20 ml
321158 Back Murray C2	1503305-5	03/12/2015	03/23/2015	03/23/2015	N/A	1	7.6	0.1		20 ml
320997 TB Moore C1	1503305-6	03/12/2015	03/23/2015	03/23/2015	N/A	1	7.6	0.1		20 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

**Data Package ID:** *ph1503305-1*

**ELECTRICAL CONDUCTIVITY @ SATURATION****Method USDA60****Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca County Soils  
**Work Order Number:** 1503305      **Final Volume:** 45 ml  
**Reporting Basis:** As Received      **Matrix:** LEACHATE  
**Prep Method:** NONE      **Result Units:** umhos/cm  
**Analyst:** Alex J. Devonald

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321007 State 267-S1	1503305-7	03/12/2015	03/23/2015	03/23/2015	N/A	10	31000	1		45 ml
321007 Sep. State 267-S1	1503305-8	03/12/2015	03/23/2015	03/23/2015	N/A	10	5100	1		45 ml
321007 Back State 267-S1	1503305-9	03/12/2015	03/23/2015	03/23/2015	N/A	10	650	1		45 ml
321158 TB Murray C2	1503305-10	03/12/2015	03/23/2015	03/23/2015	N/A	10	1400	1		45 ml
321158 Back Murray C2	1503305-11	03/12/2015	03/23/2015	03/23/2015	N/A	10	900	1		45 ml
320997 TB Moore C1	1503305-12	03/12/2015	03/23/2015	03/23/2015	N/A	10	24000	1		45 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

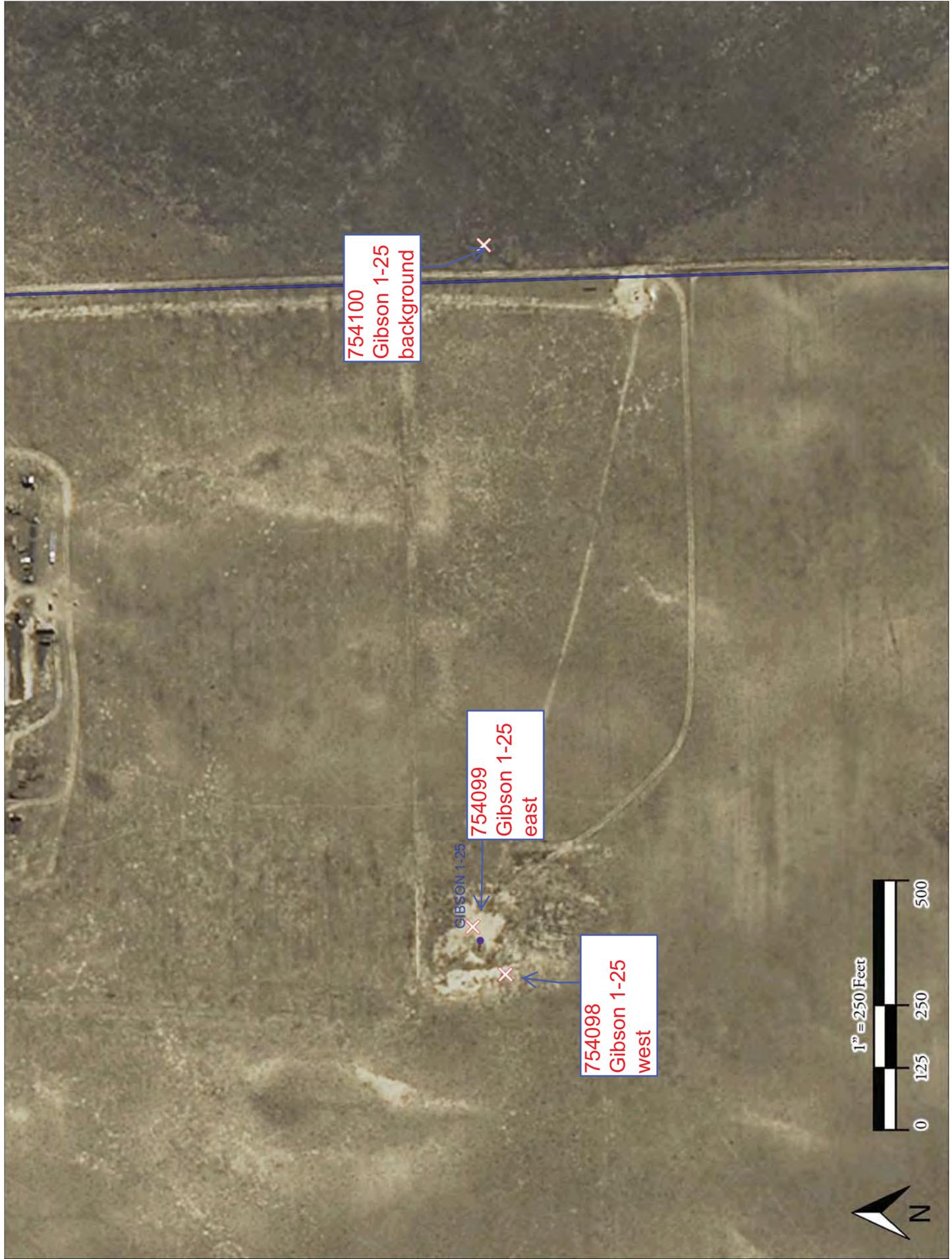
**Data Package ID:** *sc1503305-1*

Date Printed: Tuesday, March 24, 2015

ALS Environmental -- FC

Page 1 of 1

LIMS Version: 6.754

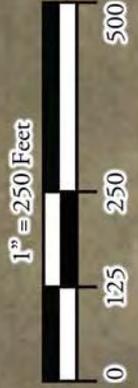


754100  
Gibson 1-25  
background

754099  
Gibson 1-25  
east

754098  
Gibson 1-25  
west

GIBSON 1-25



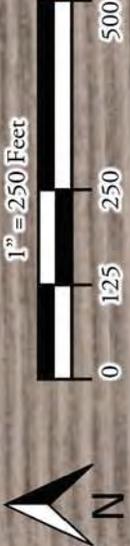




754103  
Cogburn 1  
tank

754104  
Cogburn 1  
background

COGBURN 1





STATE-ST JOHN 1-36

754105  
State St John 1-36  
tank





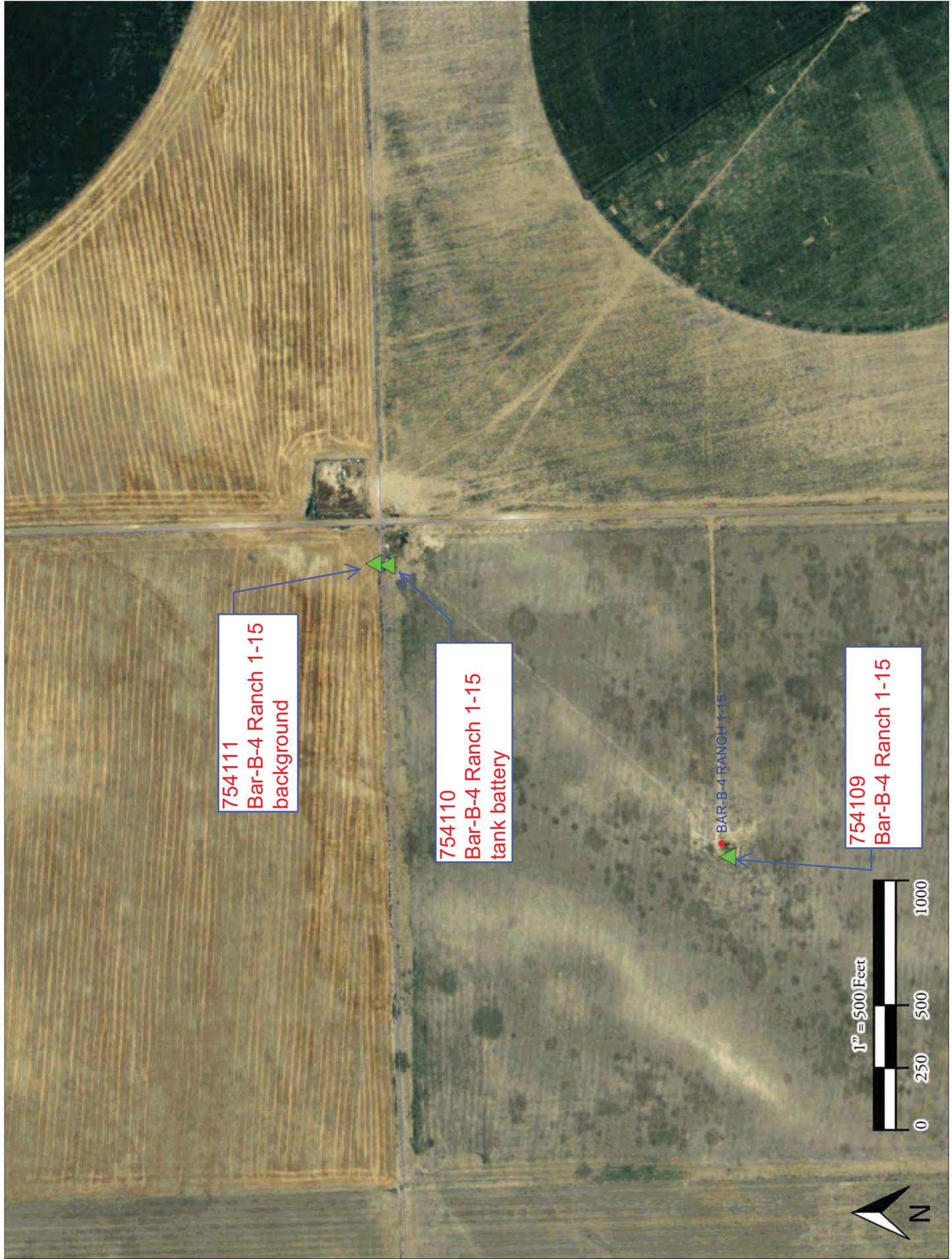
1" = 250 Feet



Thompson-Jeffrey 1-13

Exhibit 5

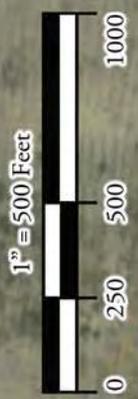




754111  
Bar-B-4 Ranch 1-15  
background

754110  
Bar-B-4 Ranch 1-15  
tank battery

754109  
Bar-B-4 Ranch 1-15





received 03/02/2015  
Project 8983

# Inorganics Case Narrative

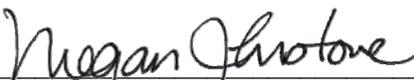
## Colorado Oil & Gas Conservation Commission Baca Soils

Work Order Number: 1502411

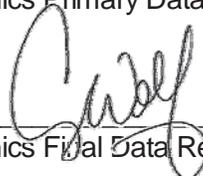
1. This report consists of 14 soil samples.
2. The samples were received cool and intact by ALS on 02/24/15.
3. The samples were analyzed following USDA60 procedures for the current revision of the following SOP and method:

<u>Analyte</u>	<u>Method</u>	<u>SOP #</u>
Paste pH	USDA60	810 Draft
Electrical conductivity	USDA60	810 Draft
Sodium Adsorption Ratio	USDA60	810 Draft

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

  
 \_\_\_\_\_  
 Megan Johnstone  
 Inorganics Primary Data Reviewer

2/28/15  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Inorganics Final Data Reviewer

2/28/15  
 \_\_\_\_\_  
 Date



## **Inorganic Data Reporting Qualifiers**

The following qualifiers are used by the laboratory when reporting results of inorganic analyses.

- Concentration qualifier -- If the analyte was analyzed for but not detected a "U" is entered.
- QC qualifier -- Specified entries and their meanings are as follows:
  - N - Spiked sample recovery not within control limits.
  - \* - Duplicate analysis (relative percent difference) not within control limits.
  - Z - Calibration spike recovery not within control limits.

# ALS Environmental -- FC

## Sample Number(s) Cross-Reference Table

**OrderNum:** 1502411

**Client Name:** Colorado Oil & Gas Conservation Commission

**Client Project Name:** Baca Soils

**Client Project Number:**

**Client PO Number:** PHAA061114PHA-04

Client Sample Number	Lab Sample Number	COC Number	Matrix	Date Collected	Time Collected
321192 W Gibson 1-25	1502411-1		SOIL	20-Feb-15	13:15
321192 E Gibson 1-25	1502411-2		SOIL	20-Feb-15	13:18
321192 Back Gibson 1-25	1502411-3		SOIL	20-Feb-15	13:31
321199 E Fullbright 1-20	1502411-4		SOIL	20-Feb-15	14:24
321199 Back Fullbright 1-20	1502411-5		SOIL	20-Feb-15	14:32
321002 TB Cogburn 1	1502411-6		SOIL	20-Feb-15	14:51
321002 Back Cogburn 1	1502411-7		SOIL	20-Feb-15	14:54
320965 TB State St John 1-36	1502411-8		SOIL	20-Feb-15	15:33
320973 Loflin-Fed 1-21	1502411-9		SOIL	20-Feb-15	9:54
321165 TB Thompson Jeffrey 1-1	1502411-10		SOIL	20-Feb-15	10:43
321165 Back Thompson Jeffrey 1	1502411-11		SOIL	20-Feb-15	10:50
321194 Bar-B-4 Ranch 1-15	1502411-12		SOIL	20-Feb-15	12:23
321194 TB Bar-B-4 Ranch 1-15	1502411-13		SOIL	20-Feb-15	12:35
321194 Back Bar-B-4 Ranch 1-15	1502411-14		SOIL	20-Feb-15	12:39
321192 W Gibson 1-25	1502411-15		SatExtract	20-Feb-15	13:15
321192 E Gibson 1-25	1502411-16		SatExtract	20-Feb-15	13:18
321192 Back Gibson 1-25	1502411-17		SatExtract	20-Feb-15	13:31
321199 E Fullbright 1-20	1502411-18		SatExtract	20-Feb-15	14:24
321199 Back Fullbright 1-20	1502411-19		SatExtract	20-Feb-15	14:32
321002 TB Cogburn 1	1502411-20		SatExtract	20-Feb-15	14:51
321002 Back Cogburn 1	1502411-21		SatExtract	20-Feb-15	14:54
320965 TB State St John 1-36	1502411-22		SatExtract	20-Feb-15	15:33
320973 Loflin-Fed 1-21	1502411-23		SatExtract	20-Feb-15	9:54
321165 TB Thompson Jeffrey 1-1	1502411-24		SatExtract	20-Feb-15	10:43
321165 Back Thompson Jeffrey 1	1502411-25		SatExtract	20-Feb-15	10:50
321194 Bar-B-4 Ranch 1-15	1502411-26		SatExtract	20-Feb-15	12:23
321194 TB Bar-B-4 Ranch 1-15	1502411-27		SatExtract	20-Feb-15	12:35
321194 Back Bar-B-4 Ranch 1-15	1502411-28		SatExtract	20-Feb-15	12:39



ALS Laboratory Group

225 Commerce Drive, Fort Collins, Colorado 80524  
 TF: (800) 443-1511 PH: (970) 490-1511 FX: (970) 490-1522

Chain-of-Custody

Form 2028

PROJECT NAME Buck Soils	SAMPLER SITE ID EDD FORMAT PURCHASE ORDER BILL TO COMPANY INVOICE ATTN TO ADDRESS CITY / STATE / ZIP PHONE FAX E-MAIL	DATE TURNAROUND	WORKORDER # 1502411	PAGE 1 of 2
COMPANY NAME Cofe. C. + Gas Cons. Central	SEND REPORT TO ADDRESS CITY / STATE / ZIP PHONE FAX E-MAIL	DATE TURNAROUND	DISPOSAL	By Lab or Return to Client
Matrix	Sample Date	Sample Time	# Bottles	Pres. QC
Field ID	Matrix	Sample Date	Sample Time	# Bottles
Lab ID	Matrix	Sample Date	Sample Time	# Bottles
9	320973 L of In - Fed 121 S	20Feb15 09:54	1	✓
10	321165 TB Thompson J. Jeffers 13 S	20Feb15 10:43	1	✓
11	321165 Back Thompson J. Jeffers 14 S	20Feb15 10:50	1	✓
12	321164 <del>14</del> Bur. B-Y Ranch 14 S	20Feb15 12:35	1	✓
13	321164 TB Bur. B-Y Ranch 15 S	20Feb15 12:35	1	✓
14	321164 Back Bur. B-Y Ranch 15 S	20Feb15 12:34	1	✓

\*Time Zone (Circle): EST CST MST PST Matrix: O = oil S = soil NS = non-soil solid W = water L = liquid E = extract F = filter

For metals or anions, please detail analytes below.

Comments:	QC PACKAGE (check below)
	<input checked="" type="checkbox"/> LEVEL II (Standard QC)
	<input type="checkbox"/> LEVEL III (Std QC + forms)
	<input type="checkbox"/> LEVEL IV (Std QC + forms + raw data)
Preservative Key:	1-HCl 2-HNO3 3-H2SO4 4-NaOH 5-NaHSO4 7-Other 8-4 degrees C 9-5035

RELINQUISHED BY	SIGNATURE	PRINTED NAME	DATE	TIME
RECEIVED BY	Peter Gintantus	Peter Gintantus	2-23-15	12:50
RELINQUISHED BY	C. J. Hunsaker	C. J. Hunsaker	2-24-15	11:30
RECEIVED BY				
RELINQUISHED BY				
RECEIVED BY				



ALS Environmental - Fort Collins  
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCC

Workorder No: 1502411

Project Manager: AW

Initials: CDJ Date: 2-24-15

1. Does this project require any special handling in addition to standard ALS procedures?		YES	<input checked="" type="radio"/> NO
2. Are custody seals on shipping containers intact?	NONE	<input checked="" type="radio"/> YES	NO
3. Are Custody seals on sample containers intact?	<input checked="" type="radio"/> NONE	YES	NO
4. Is there a COC (Chain-of-Custody) present or other representative documents?		<input checked="" type="radio"/> YES	NO
5. Are the COC and bottle labels complete and legible?		<input checked="" type="radio"/> YES	NO
6. Is the COC in agreement with samples received? (IDs, dates, times, no. of samples, no. of containers, matrix, requested analyses, etc.)		<input checked="" type="radio"/> YES	NO
7. Were airbills / shipping documents present and/or removable?	DROP OFF	<input checked="" type="radio"/> YES	NO
8. Are all aqueous samples requiring preservation preserved correctly? (excluding volatiles)	<input checked="" type="radio"/> N/A	YES	NO
9. Are all aqueous non-preserved samples pH 4-9?	<input checked="" type="radio"/> N/A	YES	NO
10. Is there sufficient sample for the requested analyses?		<input checked="" type="radio"/> YES	NO
11. Were all samples placed in the proper containers for the requested analyses?		<input checked="" type="radio"/> YES	NO
12. Are all samples within holding times for the requested analyses?		<input checked="" type="radio"/> YES	NO
13. Were all sample containers received intact? (not broken or leaking, etc.)		<input checked="" type="radio"/> YES	NO
14. Are all samples requiring no headspace (VOC, GRO, RSK/MEE, Rx CN/S, radon) headspace free? Size of bubble: ___ < green pea ___ > green pea	<input checked="" type="radio"/> N/A	YES	NO
15. Do any water samples contain sediment? Amount Amount of sediment: ___ dusting ___ moderate ___ heavy	<input checked="" type="radio"/> N/A	YES	NO
16. Were the samples shipped on ice?		YES	<input checked="" type="radio"/> NO
17. Were cooler temperatures measured at 0.1-6.0°C? IR gun used*: #2 #4		RAD ONLY	YES <input checked="" type="radio"/> NO
Cooler #: <u>1 2</u>			
Temperature (°C): <u>Amb Amb</u>			
No. of custody seals on cooler: <u>1 1</u>			
External µR/hr reading: <u>13 13</u>			
Background µR/hr reading: <u>12</u>			
Were external µR/hr readings ≤ two times background and within DOT acceptance criteria? <input checked="" type="radio"/> YES / NO / NA (If no, see Form 008.)			

Additional Information: PROVIDE DETAILS BELOW FOR A NO RESPONSE TO ANY QUESTION ABOVE, EXCEPT #1 AND #16.

SAMPLES 15-28 AVE SAT EXTRACTS

If applicable, was the client contacted? YES / NO  NA Contact: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Project Manager Signature / Date: Quoy 2/24/15

1502-411

R 614 10:30 A

Ship Date: 2/28/15  
Origin: 61415  
CIC: 407843NET30N

Delivery Address Bar Code



Country Sub Sample

Ref #  
Invoice #  
PO #  
Dept #

Ship Date: 2/28/15  
Origin: 61415  
CIC: 407843NET30N



Origin ID: FUBA

From: (719) 440-2091  
Peter Oberlander  
Cable Oil & Gas Comm. Comm.  
213 Comstock RD  
Trinidad, CO 81082

705120030000

M.I. MEMBER

SHIP TO: 61415-1511

Amy Wolf  
ALS Laboratory Group  
225 COMMERCE DR  
FORT COLLINS, CO 80524

TUE - 24 FEB 10:30A  
PRIORITY OVERNIGHT

1 of 2  
TMS 7729 6967 4400  
NO MASTER #

72 FTCA

80524  
COLR  
DEN



50 24000001-40



**PASTE PH**  
**Method USDA60**  
**Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca Soils  
**Work Order Number:** 1502411      **Final Volume:** 20 g  
**Reporting Basis:** As Received      **Matrix:** SOIL  
**Prep Method:** NONE      **Result Units:** pH  
**Analyst:** James A. Ceimet

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321192 W Gibson 1-25	1502411-1	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.9	0.1		20 ml
321192 E Gibson 1-25	1502411-2	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.6	0.1		20 ml
321192 Back Gibson 1-25	1502411-3	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.9	0.1		20 ml
321199 E Fullbright 1-20	1502411-4	02/20/2015	02/27/2015	02/27/2015	N/A	1	8.1	0.1		20 ml
321199 Back Fullbright 1-20	1502411-5	02/20/2015	02/27/2015	02/27/2015	N/A	1	8.1	0.1		20 ml
321002 TB Cogburn 1	1502411-6	02/20/2015	02/27/2015	02/27/2015	N/A	1	8.6	0.1		20 ml
321002 Back Cogburn 1	1502411-7	02/20/2015	02/27/2015	02/27/2015	N/A	1	8.1	0.1		20 ml
320965 TB State St John 1-3	1502411-8	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.3	0.1		20 ml
320973 Loflin-Fed 1-21	1502411-9	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.7	0.1		20 ml
321165 TB Thompson Jeffrey	1502411-10	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.5	0.1		20 ml
321165 Back Thompson Jeffr	1502411-11	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.5	0.1		20 ml
321194 Bar-B-4 Ranch 1-15	1502411-12	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.9	0.1		20 ml
321194 TB Bar-B-4 Ranch 1-	1502411-13	02/20/2015	02/27/2015	02/27/2015	N/A	1	8.4	0.1		20 ml
321194 Back Bar-B-4 Ranch	1502411-14	02/20/2015	02/27/2015	02/27/2015	N/A	1	7.2	0.1		20 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

**Data Package ID:** *ph1502411-1*

**ELECTRICAL CONDUCTIVITY @ SATURATION****Method USDA60****Sample Results**

**Lab Name:** ALS Environmental -- FC  
**Client Name:** Colorado Oil & Gas Conservation Commission  
**Client Project ID:** Baca Soils  
**Work Order Number:** 1502411      **Final Volume:** 45 ml  
**Reporting Basis:** As Received      **Matrix:** SatExtract  
**Prep Method:** NONE      **Result Units:** umhos/cm  
**Analyst:** James A. Ceimet

Client Sample ID	Lab ID	Date Collected	Date Prepared	Date Analyzed	Percent Moisture	Dilution Factor	Result	RptLimit/ LOQ/LOD	Flag	Sample Aliquot
321192 W Gibson 1-25	1502411-15	02/20/2015	02/27/2015	02/27/2015	N/A	10	320	1		45 ml
321192 E Gibson 1-25	1502411-16	02/20/2015	02/27/2015	02/27/2015	N/A	10	13000	1		45 ml
321192 Back Gibson 1-25	1502411-17	02/20/2015	02/27/2015	02/27/2015	N/A	10	2600	1		45 ml
321199 E Fullbright 1-20	1502411-18	02/20/2015	02/27/2015	02/27/2015	N/A	10	490	1		45 ml
321199 Back Fullbright 1-20	1502411-19	02/20/2015	02/27/2015	02/27/2015	N/A	10	460	1		45 ml
321002 TB Cogburn 1	1502411-20	02/20/2015	02/27/2015	02/27/2015	N/A	10	3400	1		45 ml
321002 Back Cogburn 1	1502411-21	02/20/2015	02/27/2015	02/27/2015	N/A	10	310	1		45 ml
320965 TB State St John 1-3	1502411-22	02/20/2015	02/27/2015	02/27/2015	N/A	10	100000	1		45 ml
320973 Loflin-Fed 1-21	1502411-23	02/20/2015	02/27/2015	02/27/2015	N/A	10	31000	1		45 ml
321165 TB Thompson Jeffrey	1502411-24	02/20/2015	02/27/2015	02/27/2015	N/A	10	59000	1		45 ml
321165 Back Thompson Jeffr	1502411-25	02/20/2015	02/27/2015	02/27/2015	N/A	10	1400	1		45 ml
321194 Bar-B-4 Ranch 1-15	1502411-26	02/20/2015	02/27/2015	02/27/2015	N/A	10	9400	1		45 ml
321194 TB Bar-B-4 Ranch 1-	1502411-27	02/20/2015	02/27/2015	02/27/2015	N/A	10	490	1		45 ml
321194 Back Bar-B-4 Ranch	1502411-28	02/20/2015	02/27/2015	02/27/2015	N/A	10	520	1		45 ml

**Comments:**

1. ND or U = Not Detected at or above the client requested detection limit.

**Data Package ID:** sc1502411-1

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321192 W Gibson 1-25	<b>Sample Matrix:</b> SatExtract	<b>Prep Batch:</b> IP150226-20	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1502411-15	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150226-20-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 20-Feb-15	<b>Run ID:</b> IT150225-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 25-Feb-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 25-Feb-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150225A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	50	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.34	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321192 E Gibson 1-25
Lab ID:	1502411-16

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	1300	10		
7439-95-4	MAGNESIUM	10	97	10		
7440-23-5	SODIUM	10	1000	10		
	SODIUM ADSORPTION RATIO	10	7.5	0.54		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321192 Back Gibson 1-25
Lab ID:	1502411-17

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	64	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.31	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321199 E Fullbright 1-20	<b>Sample Matrix:</b> SatExtract	<b>Prep Batch:</b> IP150226-20	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1502411-18	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150226-20-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 20-Feb-15	<b>Run ID:</b> IT150225-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 25-Feb-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 25-Feb-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150225A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	46	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.35	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321199 Back Fullbright 1-20	<b>Sample Matrix:</b> SatExtract	<b>Prep Batch:</b> IP150226-20	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1502411-19	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150226-20-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 20-Feb-15	<b>Run ID:</b> IT150225-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 25-Feb-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 25-Feb-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150225A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	51	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.33	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321002 TB Cogburn 1
Lab ID:	1502411-20

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	29	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	510	10		
	SODIUM ADSORPTION RATIO	10	21	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321002 Back Cogburn 1
Lab ID:	1502411-21

Sample Matrix: SatExtract

% Moisture: N/A

Date Collected: 20-Feb-15

Date Extracted: 25-Feb-15

Date Analyzed: 25-Feb-15

Prep Method: SW3010 Rev A

Prep Batch: IP150226-20

QCBatchID: IP150226-20-1

Run ID: IT150225-1A1

Cleanup: NONE

Basis: As Received

File Name: 150225A.

Analyst: Steve Workman

Sample Aliquot: 5 ML

Final Volume: 5 ML

Result Units: MG/L

Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	45	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.35	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	320965 TB State St John 1-
Lab ID:	1502411-22

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	2400	10		
7439-95-4	MAGNESIUM	10	420	10		
7440-23-5	SODIUM	1000	16000	1000		
	SODIUM ADSORPTION RATIO	1000	80	54		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	320973 Loflin-Fed 1-21
Lab ID:	1502411-23

Sample Matrix: SatExtract

% Moisture: N/A

Date Collected: 20-Feb-15

Date Extracted: 25-Feb-15

Date Analyzed: 25-Feb-15

Prep Method: SW3010 Rev A

Prep Batch: IP150226-20

QCBatchID: IP150226-20-1

Run ID: IT150225-1A1

Cleanup: NONE

Basis: As Received

File Name: 150225A.

Analyst: Steve Workman

Sample Aliquot: 5 ML

Final Volume: 5 ML

Result Units: MG/L

Clean DF: 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	970	10		
7439-95-4	MAGNESIUM	10	130	10		
7440-23-5	SODIUM	100	4600	100		
	SODIUM ADSORPTION RATIO	100	37	5.4		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321165 TB Thompson Jeffre	<b>Sample Matrix:</b> SatExtract	<b>Prep Batch:</b> IP150226-20	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1502411-24	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150226-20-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 20-Feb-15	<b>Run ID:</b> IT150225-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 25-Feb-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 25-Feb-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150225A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	2000	10		
7439-95-4	MAGNESIUM	10	420	10		
7440-23-5	SODIUM	100	8200	100		
	SODIUM ADSORPTION RATIO	100	44	5.4		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

<b>Field ID:</b> 321165 Back Thompson Jef	<b>Sample Matrix:</b> SatExtract	<b>Prep Batch:</b> IP150226-20	<b>Analyst:</b> Steve Workman
<b>Lab ID:</b> 1502411-25	<b>% Moisture:</b> N/A	<b>QCBatchID:</b> IP150226-20-1	<b>Sample Aliquot:</b> 5 ML
	<b>Date Collected:</b> 20-Feb-15	<b>Run ID:</b> IT150225-1A1	<b>Final Volume:</b> 5 ML
	<b>Date Extracted:</b> 25-Feb-15	<b>Cleanup:</b> NONE	<b>Result Units:</b> MG/L
	<b>Date Analyzed:</b> 25-Feb-15	<b>Basis:</b> As Received	<b>Clean DF:</b> 1
	<b>Prep Method:</b> SW3010 Rev A	<b>File Name:</b> 150225A.	

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	100	10		
7439-95-4	MAGNESIUM	10	18	10		
7440-23-5	SODIUM	10	120	10		
	SODIUM ADSORPTION RATIO	10	2.9	0.54		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321194 Bar-B-4 Ranch 1-15
Lab ID:	1502411-26

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	300	10		
7439-95-4	MAGNESIUM	10	37	10		
7440-23-5	SODIUM	10	1200	10		
	SODIUM ADSORPTION RATIO	10	17	0.54		

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321194 TB Bar-B-4 Ranch 1
Lab ID:	1502411-27

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	35	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	20	10		
	SODIUM ADSORPTION RATIO	10	0.79	0.54	S	

Data Package ID: *it1502411-1*

# Total Sodium Adsorption Ratio

Method USDA60 Revision B

## Sample Results

Lab Name: ALS Environmental -- FC

Work Order Number: 1502411

Client Name: Colorado Oil & Gas Conservation Commission

ClientProject ID: Baca Soils

Field ID:	321194 Back Bar-B-4 Ranc
Lab ID:	1502411-28

**Sample Matrix:** SatExtract  
**% Moisture:** N/A  
**Date Collected:** 20-Feb-15  
**Date Extracted:** 25-Feb-15  
**Date Analyzed:** 25-Feb-15  
**Prep Method:** SW3010 Rev A

**Prep Batch:** IP150226-20  
**QCBatchID:** IP150226-20-1  
**Run ID:** IT150225-1A1  
**Cleanup:** NONE  
**Basis:** As Received  
**File Name:** 150225A.

**Analyst:** Steve Workman  
**Sample Aliquot:** 5 ML  
**Final Volume:** 5 ML  
**Result Units:** MG/L  
**Clean DF:** 1

CASNO	Target Analyte	Dilution Factor	Result	RptLimit/ LOQ/LOD	Result Qualifier	EPA Qualifier
7440-70-2	CALCIUM	10	61	10		
7439-95-4	MAGNESIUM	10	0.00014	10	U	
7440-23-5	SODIUM	10	0.00012	10	U	
	SODIUM ADSORPTION RATIO	10	0.31	0.54	S	

Data Package ID: *it1502411-1*