



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

STAFF OBJECTION

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.¹

¹ 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

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

+

34² Inactive Wells > 3,000 Ft. x \$20,000 = \$680,000

-

Existing Financial Assurance = \$60,000

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.

² 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,³ 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 million⁴ 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,

³ 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.

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

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.⁵ 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

⁵ 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 money⁶ 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

⁶ 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-Due¹</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	

¹ 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.

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Conservation Commission



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	2012	8,340	7,323	514,026	514,026	15,838
SOVEREIGN OPERATING COMPANY LLC - #10383	2013	7,488	7,639	404,867	404,867	12,377
SOVEREIGN OPERATING COMPANY LLC - #10383	2014	3,406	3,363	277,571	277,571	11,543

FORM
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
	205559	320965	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
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: SWNE Sec: 36 Twp: 30S Range: 45W

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	ACTION REQUIRED			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 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	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 Tble 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/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: 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: _____ Lat _____ Long _____
 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
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

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 DocumentsYou 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548411
678300070	NW from well with no crop growth as in past years	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548412
678300071	N to former battery and well with no crop growth	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548413

678300072	2010 sampling locations and reults	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3548414
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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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
02/20/2015Document 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: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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	
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
------	------	--------	-------------------	---------

☐ 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:	
Paint					
Condition	Adequate				
Other (Content)					
Other (Capacity)					
Other (Type)					
Berms					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth	Inadequate	Walls Insufficient		Inadequate	
Corrective Action	no berm around tank			Corrective Date	04/13/2015
Comment	install adequate berms around tank before use				
Venting:					
Yes/No	Comment				
NO					
Flaring:					
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date	

Predrill

Location ID: 256506

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: 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 REVEGETATIONCropland

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

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

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

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:
	294081	321190	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
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	ACTION REQUIRED	P		No
03/06/2012	663900733	TA	TA	ALLEGED VIOLATION	P		Yes
12/01/2010	200285560	PR	TA	ACTION REQUIRED			Yes
12/11/2008	200200528	PR	TA	ACTION REQUIRED			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				
Lease Road:				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY	through farm field		
Signs/Marker:				
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): <u>SATISFACTORY</u> Corrective Date: _____				
Comment: <u>emergency contact information on signs at battery and at wellhead</u>				
Corrective Action: _____				
Good Housekeeping:				
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
Spills:				
Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				
Equipment:				
Type	#	Satisfactory/Action Required	Comment	CA Date
Vertical Separator	1	SATISFACTORY	at tank battery area	
Facilities: <input type="checkbox"/> New Tank Tank ID: _____				
Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	0			37.271110,-104.240460
S/A/V: SATISFACTORY	Comment: <u>no tanks present inside berm or at wellhead, only a separator and pipes</u>			
Corrective Action: _____			Corrective Date: _____	
Paint				
Condition	Adequate			
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					

Venting:		
Yes/No	Comment	
NO		

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

Predrill				
Location ID: 294081				
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:	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 REVEGETATIONCropland

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/webblink/>) and search by document number:

Document Num	Description	URL
678300082	wellhead and sign	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555994
678300083	weeds	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3555995

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
02/20/2015Document Number:
678300084

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

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

Operator Information:

OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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				
Lease Road:				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY	through irrigated field along road to center pivot		
Signs/Marker:				
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): SATISFACTORY				
Corrective Date: _____				
Comment: corrected from 11/06/2012 inspection				
Corrective Action: _____				
Good Housekeeping:				
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
Spills:				
Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				
Equipment:				
Type	#	Satisfactory/Action Required	Comment	Corrective Action
Ancillary equipment	1	SATISFACTORY	propane tank	
Pump Jack	1	SATISFACTORY		
Vertical Separator	1	SATISFACTORY	inside containment at battery	
Facilities: <input type="checkbox"/> New Tank Tank ID: _____				
Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	2	100 BBLS	FIBERGLASS AST	37.265733,-102.208770
S/A/V:	Comment: tanks about 1300 feet south of wellhead			
Corrective Action: _____				Corrective Date: _____

Paint

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

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			

Venting:		
Yes/No	Comment	
NO		

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

Predrill

Location ID: 294082

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: 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 REVEGETATIONCropland

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556001
678300086	weeds in tank battery containment	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3556002

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:

678300087

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

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

Operator Information:OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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: SENW Sec: 21 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)
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
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Comment	tank not in use at time of inspection
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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:	
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Paint

Condition	Inadequate
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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/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: 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: _____		
Sample 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: _____		General Chemistry: _____
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____
8270: _____	RCRA Metals: _____	910-Metals: _____
Other: <u>pH, SAR and EC</u>		
Comment:	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.	
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 REVEGETATIONCropland

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/webblink/>) and search by document number:

Document Num	Description	URL
678300089	soil sampling location and EC and SAR results	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564579

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

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:
	256507	321165	GINTAUTAS, PETER	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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	ACTION REQUIRED			Yes
12/01/2010	200285529	PR	SI	ACTION REQUIRED			Yes
03/20/2008	200128591	MT	SI	ACTION REQUIRED			Yes
01/23/2008	200125499	PR	SI	ACTION REQUIRED			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 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	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: install and maintain adequate berms around tank when brought into production Corrective Date: 04/07/2015

Comment: no berms

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 REVEGETATIONCropland

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564623
678300095	well -no sign or emergency contact and tank no berms and no labels	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564624
678300096	tank with no net or labels	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564625

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

02.20.2015 10:53

FORM
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
	294470	321194	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
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: NENE Sec: 15 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	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**Signs/Marker:**

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: _____

Spills:

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?**Equipment:**

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: _____

Venting:

Yes/No	Comment
NO	

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

Predrill

Location ID: 294470

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: 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 COMPOSITETime: 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, pHComment: 4 point composite in 10 foot diameter circl to SW of pump**Sample** Sample Type: SOIL COMPOSITETime: 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, EcComment: background sample in winter wheat field**Sample** Sample Type: SOIL COMPOSITETime: 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, ECComment: 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: <input style="width: 80%;" type="text"/>						
Corrective Action: <input style="width: 60%;" type="text"/>					Date <input style="width: 20%;" type="text"/>	
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>			Multi-Well Location <input type="checkbox"/>	
<u>Storm Water:</u>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
S/A/V: <input style="width: 20%;" type="text"/> Corrective Date: <input style="width: 40%;" type="text"/>						
Comment: <input style="width: 90%;" type="text"/>						
CA: <input style="width: 90%;" type="text"/>						
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached DocumentsYou 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564766
678300099	area sampled near PJ	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564767

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.)

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:
	294083	321192	GINTAUTAS, PETER	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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: 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	ACTION REQUIRED			Yes
12/11/2008	200200582	PR	PR	ACTION REQUIRED			Yes
05/12/2008	200189938	PR	WO	ACTION REQUIRED			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			

Venting:		
Yes/No	Comment	
NO		

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

Predrill

Location ID: 294083

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: 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 REVEGETATIONCropland

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: <input checked="" type="checkbox"/> 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564768
678300102	sampling site to east of pumpjack	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564769

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
02/20/2015Document Number:
678300103

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

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

Operator Information:

OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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	ACTION REQUIRED	I		No
12/01/2010	200285550	PR	TA	ACTION REQUIRED			Yes
04/13/2010	200243428	PR	SI	ACTION REQUIRED			Yes
12/11/2008	200200505	PR	PR	ACTION REQUIRED			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 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

Signs/Marker:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
BATTERY	SATISFACTORY			
TANK LABELS/PLACARDS	ACTION REQUIRED	NFPA signs illegible	Install sign to comply with rule 210.	04/09/2015
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
WEEDS	ACTION REQUIRED	weeds growing inside containment area at tank battery	remove weeds from opeartions area	04/09/2015
UNUSED EQUIPMENT	ACTION REQUIRED	unused balance weights on ground near pumpjack	remove unused equipment from location	04/09/2015

Spills:

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

☐ Multiple Spills and Releases?**Equipment:**

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

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 _____

Venting:		
Yes/No	Comment	
NO		

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

Predrill

Location ID: 261

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: 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564901
678300105	tank	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564902
678300106	weights on ground	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564903

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:

678300107

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

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

Operator Information:OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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: SWSW Sec: 29 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	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 REVEGETATIONCropland

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564904
678300109	unused equipment	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564905
678300110	tank area sampling location	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3564906

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

02.20.2015 14:56

FORM
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:

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

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
WELLHEAD	SATISFACTORY			
BATTERY	SATISFACTORY			

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

Comment: corrected since last inspection

Corrective Action: _____

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

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	fence pieces on ground at well	repair fence or remove pieces from ground and location	04/13/2015

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

Facilities: <input type="checkbox"/> 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				
Venting:				
Yes/No	Comment			
Flaring:				
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:

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
678300116	at well	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566120
678300117	at old TB	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566121

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:

678300118

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	294472	321196	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
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	ACTION REQUIRED			No
03/06/2012	663900731	SI	TA	ALLEGED VIOLATION	P		Yes
04/07/2011	200307156	PR	SI	ACTION REQUIRED			Yes
09/09/2010	200272469	PR	PR	ACTION REQUIRED			Yes
04/13/2010	200243367	PR	SI	ACTION REQUIRED			Yes
12/11/2008	200200595	PR	PR	ACTION REQUIRED			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				
Lease Road:				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY	through center pivot irrigated field		
Signs/Marker:				
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: _____				
Good Housekeeping:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED	see photo	remove unused equipment from location	04/13/2015
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			
Equipment:				
Type	#	Satisfactory/Action Required	Comment	Corrective Action
Pump Jack	1	SATISFACTORY		
Vertical Separator	1	SATISFACTORY	at tank battery	
Facilities: <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: _____
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				

Venting:	
Yes/No	Comment

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

Predrill

Location ID: 294472

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: 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:

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 REVEGETATIONCropland

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3566122

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
03/12/2015Document Number:
678300122

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

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

Operator Information:

OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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@bseglc.com	all inspections

Compliance Summary:

QtrQtr: SES Sec: 16 Twp: 31S Range: 43W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/27/2014	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	<input checked="" type="checkbox"/>

Equipment:

Location Inventory

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

Location**Lease Road:**

Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY			

Signs/Marker:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED	NFPA label has become illegible and no sign indicating volume of tank is present	Install sign to comply with rule 210.	04/15/2015

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

Corrective Date: 04/15/2015

Comment: sign present but laying on ground and not visible

Corrective Action: Ensure that sign is mounted and visible

Spills:

Type	Area	Volume	Corrective action	CA Date
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☐ Multiple Spills and Releases?**Fencing/:**

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

Equipment:

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

Facilities:☐ New Tank

Tank ID: _____

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

S/A/V: SATISFACTORY Comment: at well site

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	berms around tank must be repaired if well is put into production with use of tank			Corrective Date 04/15/2015
Comment				

Venting:

Yes/No	Comment
NO	

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 205764

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: 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 REVEGETATIONCropland

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

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

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
03/12/2015Document Number:
678300129

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	205724	320996	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	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bseglc.com	all inspections

Compliance Summary:

QtrQtr: SWSW Sec: 28 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)
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**Signs/Marker:**

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: _____

Good Housekeeping:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
UNUSED EQUIPMENT	ACTION REQUIRED		remove unused equipment from location	04/17/2015

Spills:

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

☐ Multiple Spills and Releases?**Equipment:**

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

Facilities:☐ 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) _____

Berms

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				
<u>Venting:</u>				
Yes/No	Comment			
NO				
<u>Flaring:</u>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
<u>Predrill</u>				
Location ID: 205724				
<u>Site Preparation:</u>				
Lease Road Adeq.:		Pads:	Soil Stockpile:	
<u>S/A/V:</u>				
Corrective Action:		Date:	CDP Num.:	
<u>Form 2A COAs:</u>				
<u>S/A/V:</u>	<u>Comment:</u>			
<u>CA:</u>				<u>Date:</u>
<u>Wildlife BMPs:</u>				
<u>S/A/V:</u>	<u>Comment:</u>			
<u>CA:</u>				<u>Date:</u>
<u>Stormwater:</u>				
<u>Comment:</u>				
<u>Staking:</u>				
<u>On Site Inspection (305):</u>				
<u>Surface Owner Contact Information:</u>				
Name:		Address:		
Phone Number:		Cell Phone:		
<u>Operator Rep. Contact Information:</u>				
Landman Name:		Phone Number:		
Date Onsite Request Received:		Date of Rule 306 Consultation:		
Request LGD Attendance:				
<u>LGD Contact Information:</u>				
Name:		Phone Number:	Agreed to Attend:	
<u>Summary of Landowner Issues:</u>				
<u>Summary of Operator Response to Landowner Issues:</u>				
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>				
<u>Facility</u>				
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:

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

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:

678300130

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	206169	321157	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	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	ACTION REQUIRED			Yes
11/12/2009	200222377	PR	PR	ACTION REQUIRED			Yes
01/02/2008	200124176	PR	PR	ACTION REQUIRED			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: _____

Spills:

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

☐ Multiple Spills and Releases?**Venting:**

Yes/No	Comment

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 206169

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: 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 REVEGETATIONCropland

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 PassPit mouse/rat holes, cellars backfilled PassDebris removed Pass

No disturbance /Location never built _____

Access Roads Regraded PassContoured 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 FailWell 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 DocumentsYou can go to COGCC Images (<https://cogcc.state.co.us/webblink/>) and search by document number:

Document Num	Description	URL
678300131	location on 12 March 2015	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3568854

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:

678300142

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	205983	321083	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	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bseglc.com	all inspections

Compliance Summary:

QtrQtr: SWNE Sec: 31 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	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 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**Signs/Marker:**

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: _____

Good Housekeeping:

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

Spills:

Type	Area	Volume	Corrective action	CA Date
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☐ Multiple Spills and Releases?**Equipment:**

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Horizontal Separator	1	SATISFACTORY			
Gas Meter Run	1	SATISFACTORY			

Venting:

Yes/No	Comment
NO	

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 205983

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:****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 COMPOSITETime: 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 ECComment: 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: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
Overall Interim Reclamation _____		

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____	Date Final Reclamation Completed: _____
Final Land Use: _____	
Reminder: _____	
Comment: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	
Well plugged _____	Pit mouse/rat holes, cellars backfilled _____
Debris removed _____	No disturbance /Location never built _____
Access Roads _____	Regraded _____
Gravel removed _____	Contoured _____
	Culverts 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: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	
Corrective Action: <div style="border: 1px solid black; height: 20px; width: 80%;"></div>	Date _____
Overall Final Reclamation _____	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
	294086	321193	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	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bseglc.com	all inspections

Compliance Summary:

QtrQtr: SENW Sec: 19 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)
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

Signs/Marker:				
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: _____

Good Housekeeping:				
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?				

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

Facilities:				
<input type="checkbox"/> 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			

Venting:		
Yes/No	Comment	

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

Predrill

Location ID: 294086

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: 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577494
678300145	berms	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577495

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:
03/09/2015Document Number:
678300146

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

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

Operator Information:OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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	ACTION REQUIRED			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 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

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

Emergency Contact Number (S/A/V): _____ 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 locations	04/27/2015

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	steel panels		

Equipment:				
Type	#	Satisfactory/Action Required	Comment	Corrective Action
Pump Jack				

Venting:				
Yes/No	Comment			

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

Predrill

Location ID: 294490

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: 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 _____																													
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">Sample</td> <td style="width: 40%;">Sample Type: SOIL COMPOSITE</td> <td style="width: 50%;"></td> </tr> <tr> <td>Time: 03/09/2015 12:55 (MM/dd/yyyy hh:mm)</td> <td>GPS: Lat 37.254710</td> <td>Long -102.158610</td> </tr> <tr> <td>BTEX: _____</td> <td>TPH: _____</td> <td>Anion: _____</td> </tr> <tr> <td colspan="2">Captions: _____</td> <td>General Chemistry: _____</td> </tr> <tr> <td>Dissolved Methane: _____</td> <td>Composition: _____</td> <td>Stable Isotopes: _____</td> </tr> <tr> <td>8260: _____</td> <td>RCRA Metals: _____</td> <td>910-Metals: _____</td> </tr> <tr> <td>PAH: _____</td> <td colspan="2"></td> </tr> <tr> <td colspan="3">Other: SAR, pH and EC</td> </tr> <tr> <td colspan="3">Comment: SAR and EC elevated above thresholds in table 910-1</td> </tr> </table>			Sample	Sample Type: SOIL COMPOSITE		Time: 03/09/2015 12:55 (MM/dd/yyyy hh:mm)	GPS: Lat 37.254710	Long -102.158610	BTEX: _____	TPH: _____	Anion: _____	Captions: _____		General Chemistry: _____	Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____	8260: _____	RCRA Metals: _____	910-Metals: _____	PAH: _____			Other: SAR, pH and EC			Comment: SAR and EC elevated above thresholds in table 910-1		
Sample	Sample Type: SOIL COMPOSITE																												
Time: 03/09/2015 12:55 (MM/dd/yyyy hh:mm)	GPS: Lat 37.254710	Long -102.158610																											
BTEX: _____	TPH: _____	Anion: _____																											
Captions: _____		General Chemistry: _____																											
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____																											
8260: _____	RCRA Metals: _____	910-Metals: _____																											
PAH: _____																													
Other: SAR, pH and EC																													
Comment: SAR and EC elevated 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 _____																												
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	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 REVEGETATIONCropland

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/webblink/>) and search by document number:

Document Num	Description	URL
678300147	unused equipment	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577506

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
	205761	321007	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
Metzger, Thomas	303-297-0347	tmetzger@bsegllc.com	all inspections
Crane, Rocky	719-529-0682	rockycrane@yahoo.com	Baca County inspections

Compliance Summary:

QtrQtr: SESW Sec: 16 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)
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**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 around equipment	remove weeds and control weeds	04/29/2015

Spills:

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

☐ Multiple Spills and Releases?**Fencing/:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK BATTERY	ACTION REQUIRED	fencing around wellhead and nearby tank with sections laying on ground	re-install panels or remove from location	04/29/2015

Equipment:

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

Facilities:☐ New Tank

Tank ID: _____

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

S/A/V: _____ Comment: **beside well and pumpjack on location**

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 maintain berms if well is put back into production	Corrective Date	04/29/2015
Comment	noted in previous inspections		

Venting:

Yes/No	Comment
NO	

<u>Flaring:</u>				
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 WellPurpose: ☒ 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 REVEGETATIONCropland

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: <input checked="" type="checkbox"/> 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.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577523

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
03/12/2015Document Number:
678300153

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	206170	321158	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	Baca County inspections
Metzger, Thomas	303-297-0347	tmetzger@bseglc.com	all inspections

Compliance Summary:

QtrQtr: NENE Sec: 29 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)
11/06/2012	663901925	SI	TA	SATISFACTORY			No
07/09/2012	663901314	SI	TA	ACTION REQUIRED	P		No
04/07/2011	200307018	MT	TA	SATISFACTORY			No
04/07/2011	200307149	ID	TA	ACTION REQUIRED			Yes
03/15/2011	200302837	PM	SI	ACTION REQUIRED			Yes
08/09/2010	200266495	PR	SI	ACTION REQUIRED			Yes
11/12/2009	200222371	PR	SI	ACTION REQUIRED			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
------	------	--------	-------------------	---------

☐ 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) _____

Berms

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				

Venting:

Yes/No	Comment

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 206170

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

Idle WellPurpose: ☐ Shut In ☒ Temporarily Abandoned Reminder: _____

S/A/V: 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:

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
678300154	berms	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577671
678300155	unused equipment	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577672

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
INSPRev
05/11State of Colorado
Oil and Gas Conservation Commission1120 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:
03/12/2015Document Number:
678300156

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

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

Operator Information:

OGCC Operator Number: 10383Name of Operator: SOVEREIGN OPERATING COMPANY LLCAddress: 475 17TH STREET #1200City: 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@bseglc.com	all inspections

Compliance Summary:

QtrQtr: SENV Sec: 29 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)
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	<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 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
------	------	--------	-------------------	---------

☐ 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/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: 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 _____		
Sample 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: _____	8260: _____	8260: _____
8270: _____	RCRA Metals: _____	910-Metals: _____
PAH: _____	PAH: _____	PAH: _____
Other: <u>SAR, pH and EC</u>		
Comment: <u>SAR and EC are 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 REVEGETATIONCropland

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/webblink/>) and search by document number:

Document Num	Description	URL
678300157	berms and label	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577821

678300158	weeds	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3577822
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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.

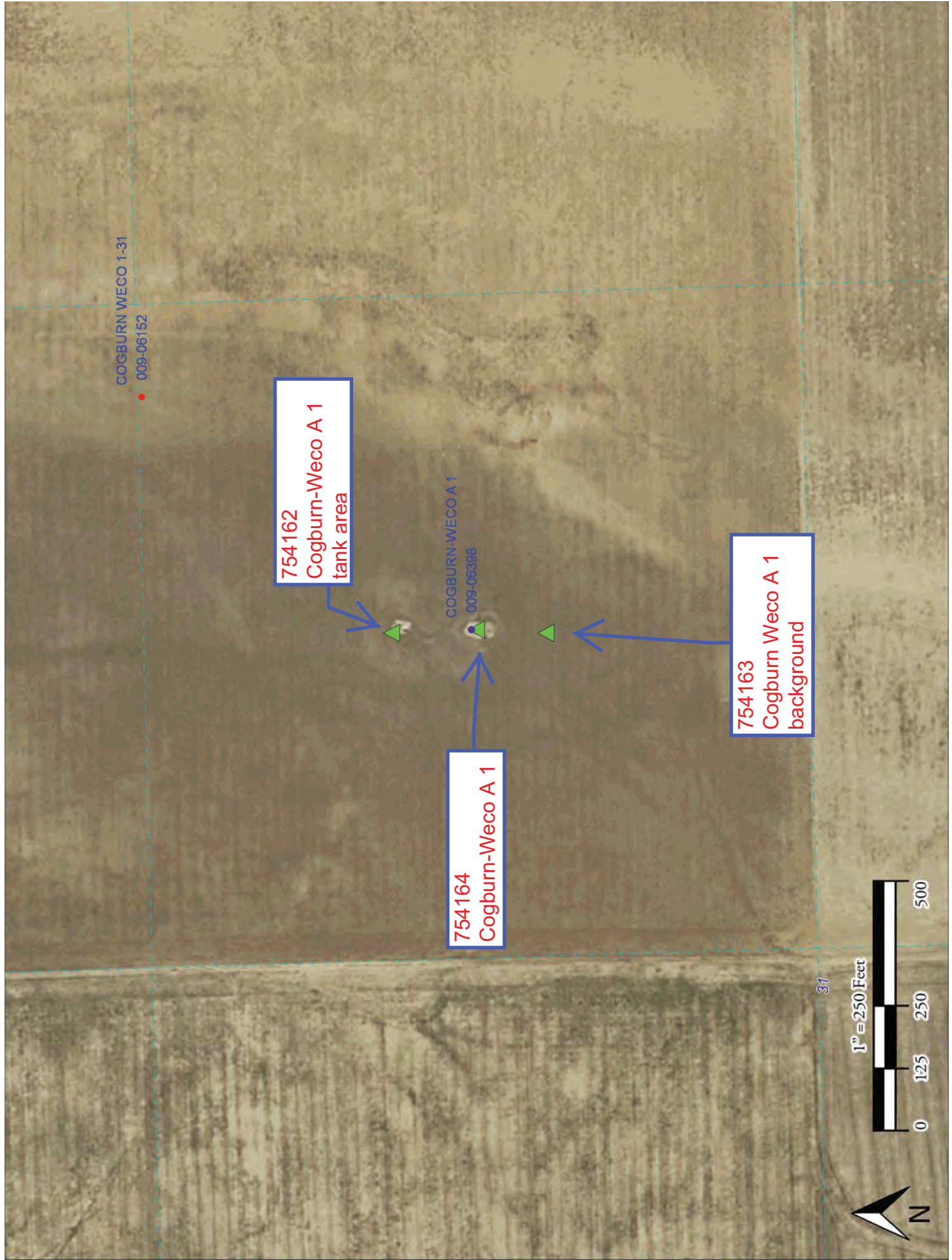
There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. 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.)

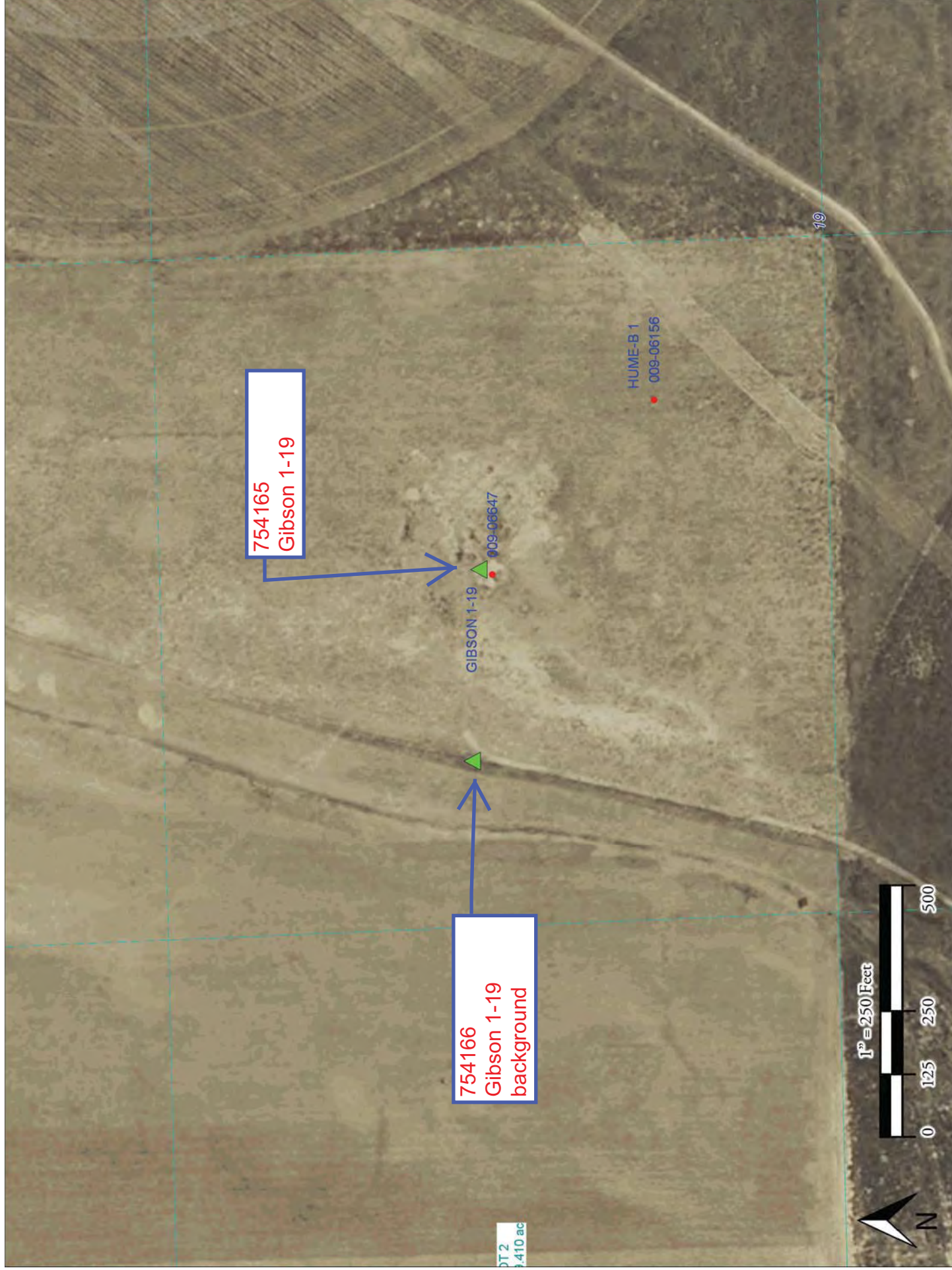
Exhibit 4

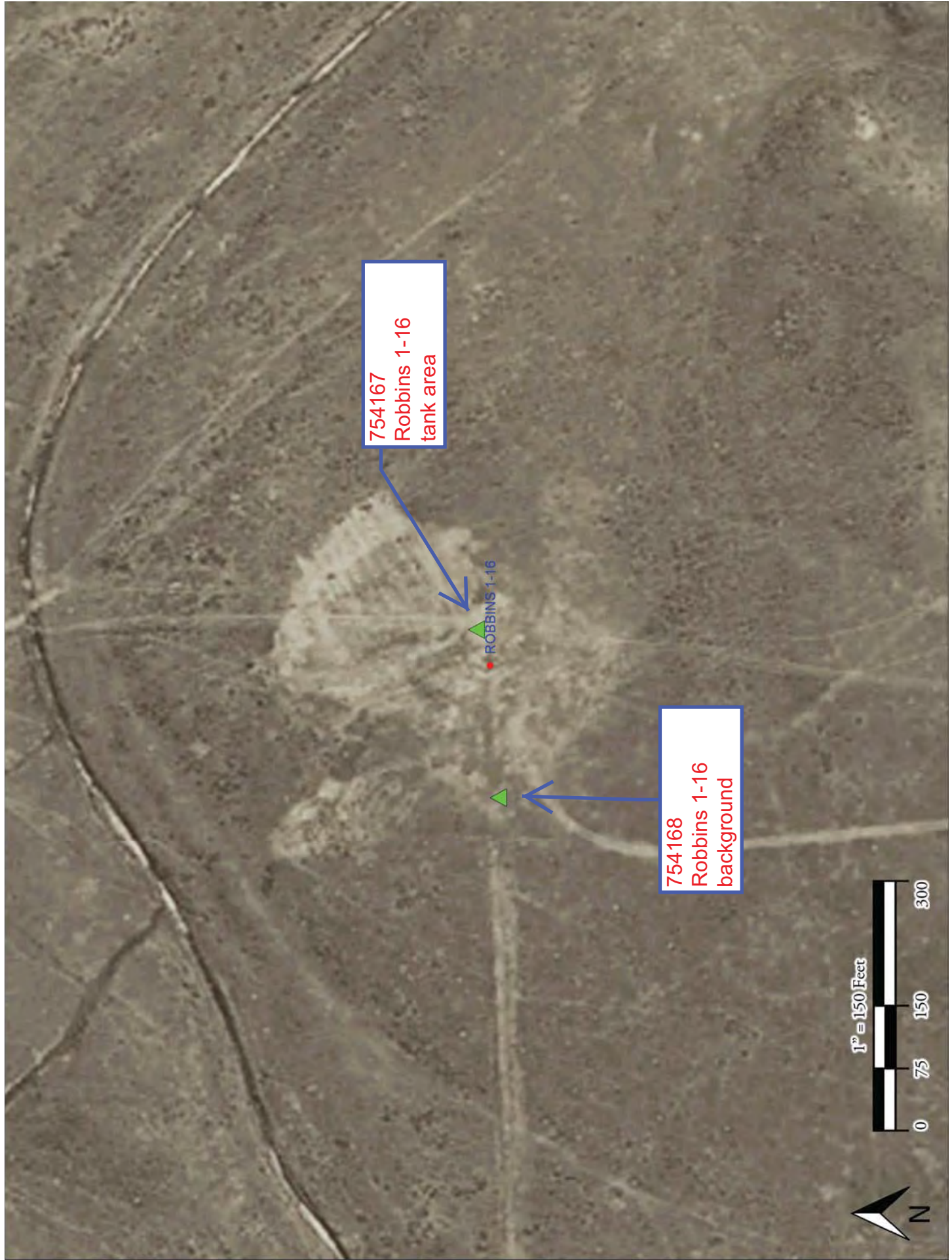
ENVDB Facility #	Facility # and Name	Sample Date & Time	Latitude	Longitude	pH	ELECTRICAL CONDUCTIVITY @ SATURATION	SODIUM ADSORPTION RATIO	units
						SU	µmhos/cm	
						6-9	4000µmhos or 2X background	
								Table 910-1 <12 threshold
754098	321192 Gibson 1-25 west	2015-02-20T13:15:00	37.23284	-102.2091	7.9	7.9	320	0.34
754099	321192 Gibson 1-25 east	2015-02-20T13:18:00	37.23301	-102.20877	7.6	7.6	13000	7.5
754100	321192 Gibson 1-25 background	2015-02-20T13:31:00	37.23284	-102.20412	7.9	7.9	2600	0.31
754101	321199 Fullbright 1-20 East	2015-02-20T14:24:00	37.241542	-102.28805	8.1	8.1	490	0.35
754102	321199 Fulbright 1-20 background	2015-02-20T14:32:00	37.24187	-102.28889	8.1	8.1	460	0.33
754103	321002 Cogburn 1 tank	2015-02-20T14:51:00	37.225694	-102.290677	8.6	8.6	3400	21
754104	321002 Cogburn 1 background	2015-02-20T14:54:00	37.22549	-102.29059	8.1	8.1	310	0.35
754105	320965 State St John 1-36 tank	2015-02-20T15:33:00	37.39255	-102.42577	7.3	7.3	100000	80
754106	320973 Loflin Federal 1-21 south of tanks	2015-02-20T09:54:00	37.33135	-102.38934	7.7	7.7	31000	37
754107	321165 Thompson-Jeffrey 1-13 tank area	2015-02-20T10:43:00	37.34468	-102.31982	7.5	7.5	59000	44
754108	321165 Thompson-Jeffrey 1-13 background	2015-02-20T10:50:00	37.34484	-102.32014	7.5	7.5	1400	2.9
754109	321194 Bar-B-4 Ranch 1-15	2015-02-20T12:23:00	37.26201	-102.24533	7.9	7.9	9400	17
754110	321194 Bar-B-4 Ranch tank battery	2015-02-20T12:35:00	37.26564	-102.24121	8.4	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	7.2	520	0.31
754162	321083 Cogburn-Weco A 1 tank	2015-03-09T10:07:00	37.2171	-102.30182	8.3	8.3	1800	9.1
754163	321083 Cogburn-Weco A 1 background	2015-03-09T10:15:00	37.21625	-102.30185	7.9	7.9	450	0.3
754164	321083 Cogburn-Weco A 1	2015-03-09T10:18:00	37.21663	-102.30182	7.7	7.7	780	2.8
754165	321193 Gibson 1-19	2015-03-09T11:19:00	37.24575	-102.19757	9	9	1400	9
754166	321193 Gibson 1-19 background	2015-03-09T11:27:00	37.24582	-102.19887	7.4	7.4	530	0.31
754167	321197 Robbins 1-16 tank area	2015-03-09T12:55:00	37.25471	-102.15861	7.5	7.5	20000	20
754168	321197 Robbins 1-16 background	2015-03-09T12:55:00	37.25465	-102.1593	7.2	7.2	560	0.93
754171	321007 State 267-S 1	2015-03-12T12:44:00	37.34119	-102.15988	7.6	7.6	31000	32
754172	321007 State 267-S 1 separator	2015-03-12T12:46:00	37.34093	-102.15986	8	8	5100	15
754173	321007 State 267-S 1 background	2015-03-12T12:52:00	37.34122	-102.15895	6.9	6.9	650	0.26
754174	321158 Murray C 2 tank battery	2015-03-12T13:15:00	37.32384	-102.17038	7.8	7.8	1400	0.77
754175	321158 Murray C 2 background	2015-03-12T13:35:00	37.32423	-102.17033	7.6	7.6	900	0.33
754176	320997 Moore C 1 tank battery	2015-03-12T13:19:00	37.31708	-102.17892	7.6	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

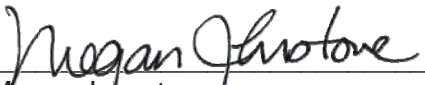
Colorado Oil & Gas Conservation Commission Baca Soils

Work Order Number: 1503146

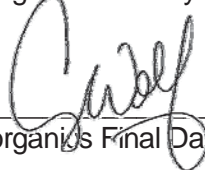
1. This report consists of 7 soil samples.
2. The samples were received cool and intact by ALS on 03/11/15.
3. The samples were analyzed following USDA60 procedures for the current revision of the following SOP and method:

<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 20278

PROJECT NAME <i>Baca Scis</i>		SAMPLER SITE ID <i>PAG</i>		DATE <i>10 March 2015</i>		WORKORDER # <i>1503140</i>
PROJECT No.		EDD FORMAT		TURNAROUND		PAGE DISPOSAL
COMPANY NAME <i>Calo Oil Gas Co., Inc.</i>		PURCHASE ORDER		of 1		By Lab or Return to Client
SEND REPORT TO <i>Peter Gintantars</i>		BILL TO COMPANY				
ADDRESS <i>PO Box 106</i>		INVOICE ATTN TO				
CITY / STATE / ZIP <i>Timber Lake 81082</i>		ADDRESS				
PHONE <i>719-446-3091</i>		CITY / STATE / ZIP				
FAX		PHONE				
E-MAIL <i>peter.gintantars@stelo.com</i>		FAX				
E-MAIL		E-MAIL				
Lab ID	Field ID	Matrix	Sample Date	Sample Time	# Bottles	Pres. QC
①	321083 Tank Cogburn Waco AL 5	S	9 March 10:07	1		
②	321083 Back Cogburn Waco AL 5	S	9 March 10:15	1		
③	321083 Cogburn Waco AL 5	S	9 March 10:14	1		
④	321193 Gibson 1-19	S	9 March 11:19	1		
⑤	321193 Back Gibson 1-19	S	9 March 11:27	1		
⑥	321197 Tank Robbins H-16	S	9 March 12:55	1		
⑦	321197 Back Robbins H-16	S	9 March 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)	
	<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	<i>Peter Gintantars</i>	<i>Peter Gintantars</i>	<i>10 March 2015</i>	<i>12:50</i>
RELINQUISHED BY	<i>Erin Peterson</i>	<i>Erin Peterson</i>	<i>3/11/15</i>	<i>1015</i>
RECEIVED BY				
RELINQUISHED BY				
RECEIVED BY				



ALS Environmental - Fort Collins
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCC Workorder No: 1503146
Project Manager: ARW Initials: ECP Date: 3/11/15

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

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

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

<p>Ship Date: 04/04/15 Rating: 4.5 US CAC: 4874000000000000</p> <p>Delivery Address Bar Code</p>  <p>Ref # Business unit number PO # Dept #</p>		<p>WED - 11 MAR 10:30A PRIORITY OVERNIGHT</p> <p>7730 8030 0111</p> <p>72 FTCA</p> <p>80524 CO-US DEN</p>  <p>5274000000000000</p>	
<p>From: 0719 800 5001 FedEx 210 Commercial RD Tilledale, CO 81002</p> <p>Origin ID: 0100A</p> <p>FedEx Express</p> <p>E J000000000</p> <p>Bill Sender</p>		<p>Ship To: 0719 800 5001 Amy Wolf ALS Laboratory Group 225 COMMERCE DR FORT COLLINS, CO 80524</p> 	

RT 614 1 10:30 0111 A
 FZ

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
Reporting Basis: As Received
Prep Method: NONE
Analyst: Alex J. Devonald
Final Volume: 45 ml
Matrix: LEACHATE
Result Units: umhos/cm

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

Field ID:	321083 Tank Cogburn Wec	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-8	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-9	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150316A.		

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

Field ID:	321083 Cogburn Weco AI	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-10	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-11	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150316A.		

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

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-13	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150316A.		

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150313-30	Analyst:	Steve Workman
Lab ID:	1503146-14	% Moisture:	N/A	QCBatchID:	IP150313-30-1	Sample Aliquot:	5 ML
		Date Collected:	09-Mar-15	Run ID:	IT150316-1A1	Final Volume:	5 ML
		Date Extracted:	12-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	16-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150316A.		

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*







received 03/24/2015
Project 8983



Inorganics Case Narrative

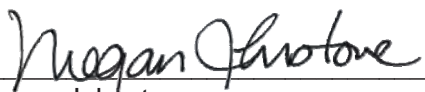
Colorado Oil & Gas Conservation Commission Baca County Soils

Work Order Number: 1503305

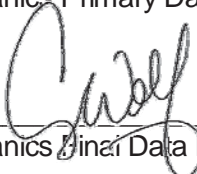
1. This report consists of 6 soil samples.
2. The samples were received cool and intact by ALS on 03/17/15.
3. The samples were analyzed following USDA60 procedures for the current revision of the following SOP and method:

<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 Final 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

OrderNum: 1503305

Client Name: Colorado Oil & Gas Conservation Commission

Client Project Name: Baca County Soils

Client Project Number:

Client PO Number: PHAA061114PHA-04

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) 490-1511 FX: (970) 490-1522

Chain-of-Custody

Form 202d8

WORKORDER #	1503305
PAGE	1 of 1

PROJECT NAME	Bala County Sails	DATE	16 March 2015	By Lab or	Return to Client
PROJECT No.		TURNAROUND	5 days	DISPOSAL	
COMPANY NAME	Cole, O. + Thos. Corp.				
SEND REPORT TO	Peter Gintantus				
ADDRESS	PO Box 100				
CITY / STATE / ZIP	Timberland CO 81002				
PHONE	719-846-3091				
FAX					
E-MAIL	peter.gintantus@stataway.com				

Lab ID	Field ID	Matrix	Sample Date	Sample Time	# Bottles	Pres.	QC
①	321007 State 207-S1	S	12 March 15	12:44	1	-	X X X ⑦
②	321007 Sep. State 207-S1	S	12 March 15	12:46	1	-	X X X ⑧
③	321007 Back State 207-S1	S	12 March 15	12:52	1	-	X X X ⑨
④	321156 TB Mustang C2	S	12 March 15	13:15	1	-	✓ ✓ ✓ ⑩
⑤	321156 Back Mustang C2	S	12 March 15	13:19	1	-	✓ ✓ ✓ ⑪
⑥	320997 TB Mustang C-1	S	12 March 15	13:35	1	-	✓ ✓ ✓ ⑫

*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	16 March 15	11:05
RELINQUISHED BY	Erin Peterson	Erin Peterson	3/17/15	09:50
RECEIVED BY				
RELINQUISHED BY				
RECEIVED BY				



ALS Environmental - Fort Collins
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCCWorkorder No: 1503305Project Manager: ARWInitials: ECP Date: 3/17/15

1. Does this project require any special handling in addition to standard ALS procedures?		YES	<u>NO</u>
2. Are custody seals on shipping containers intact?	NONE	<u>YES</u>	NO
3. Are Custody seals on sample containers intact?	<u>NONE</u>	YES	NO
4. Is there a COC (Chain-of-Custody) present or other representative documents?		<u>YES</u>	NO
5. Are the COC and bottle labels complete and legible?		<u>YES</u>	NO
6. Is the COC in agreement with samples received? (IDs, dates, times, no. of samples, no. of containers, matrix, requested analyses, etc.)		<u>YES</u>	NO
7. Were airbills / shipping documents present and/or removable?	DROP OFF	<u>YES</u>	NO
8. Are all aqueous samples requiring preservation preserved correctly? (excluding volatiles)	<u>N/A</u>	YES	NO
9. Are all aqueous non-preserved samples pH 4-9?	<u>N/A</u>	YES	NO
10. Is there sufficient sample for the requested analyses?		<u>YES</u>	NO
11. Were all samples placed in the proper containers for the requested analyses?		<u>YES</u>	NO
12. Are all samples within holding times for the requested analyses?		<u>YES</u>	NO
13. Were all sample containers received intact? (not broken or leaking, etc.)		<u>YES</u>	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	<u>N/A</u>	YES	NO
15. Do any water samples contain sediment? Amount Amount of sediment: _____ dusting _____ moderate _____ heavy	<u>N/A</u>	YES	NO
16. Were the samples shipped on ice?		YES	<u>NO</u>
17. Were cooler temperatures measured at 0.1-6.0°C? IR gun used*: #2 #4 RAD ONLY		YES	<u>NO</u>
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? <u>YES</u> / NO / NA (If no. see Form 008.)			

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

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

Project Manager Signature / Date: [Signature] 3/17/15

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-7	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150323A.		

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-8	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150323A.		

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-9	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150323A.		

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

Field ID:	321158 TB Murray C2	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-10	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-11	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150323A.		

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	Sample Matrix:	LEACHATE	Prep Batch:	IP150323-1	Analyst:	Steve Workman
Lab ID:	1503305-12	% Moisture:	N/A	QCBatchID:	IP150323-1-1	Sample Aliquot:	5 ML
		Date Collected:	12-Mar-15	Run ID:	IT150323-1A1	Final Volume:	5 ML
		Date Extracted:	23-Mar-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	23-Mar-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150323A.		

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
Reporting Basis: As Received
Prep Method: NONE
Analyst: Alex J. Devonald
Final Volume: 45 ml
Matrix: LEACHATE
Result Units: umhos/cm

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*

















received 03/02/2015
Project 8983

Inorganics Case Narrative

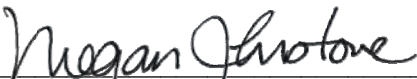
Colorado Oil & Gas Conservation Commission Baca Soils

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

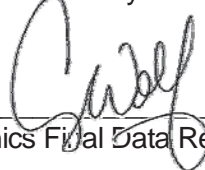
The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, ALS certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.



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



Chain-of-Custody

Exhibit 5

*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.

4 of 24

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



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 2024b

WORKORDER #	1502411
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PAGE	1 of 2
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DATE	23 Feb 15
TURNAROUND	5 business days

SAMPLER	PHC
SITE ID	
EDD FORMAT	
PURCHASE ORDER	
BILL TO COMPANY	
INVOICE ATTN TO	
ADDRESS	
CITY / STATE / ZIP	
PHONE	
FAX	
E-MAIL	

PROJECT NAME	Bull Gulch
PROJECT No.	

COMPANY NAME	Colo. C. + Gras Cons. General
SEND REPORT TO	Peter Gintantus
ADDRESS	PO Box 148
CITY / STATE / ZIP	Trinidad CO 81062
PHONE	714 446 3091
FAX	
E-MAIL	peter.gintantus@state.colo.gov

Lab ID		Field ID		Matrix		Sample Date		Sample Time		# Bottles		Pres.		QC
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9	320973	L of In - Feb 121	S	20 Feb 15	09:54	1	✓	✓	✓	✓	✓	✓	✓	✓
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10	321165	JB Thompson Jellied	S	20 Feb 15	10:43	1	✓	✓	✓	✓	✓	✓	✓	✓
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11	321165	Black Thompson Jellied	S	20 Feb 15	10:50	1	✓	✓	✓	✓	✓	✓	✓	✓
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12	321164	Bur-B-Y Ranch	S	20 Feb 15	12:35	1	✓	✓	✓	✓	✓	✓	✓	✓
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13	321164	Bur-B-Y Ranch	S	20 Feb 15	12:35	1	✓	✓	✓	✓	✓	✓	✓	✓
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14	321164	Bur-B-Y Ranch	S	20 Feb 15	12:35	1	✓	✓	✓	✓	✓	✓	✓	✓
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*Time Zone (Circle): EST CST MST PST Matrix: O = oil S = soil NS = non-soil solid W = water L = liquid E = extract F = filler

For metals or anions, please detail analytes below.

Comments:	QC PACKAGE (check below)
	LEVEL II (Standard QC) <input checked="" type="checkbox"/>
	LEVEL III (Std QC + forms) <input type="checkbox"/>
	LEVEL IV (Std QC + forms + raw data) <input type="checkbox"/>
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	23 Feb 15	12:50
RELINQUISHED BY	C. Trumble	C. Trumble	2-24-15	1130
RECEIVED BY				
RELINQUISHED BY				
RECEIVED BY				



ALS Environmental - Fort Collins
CONDITION OF SAMPLE UPON RECEIPT FORM

Client: COGCC
Project Manager: AW

Workorder No: 1502411
Initials: CDT 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?	NONE	<input checked="" type="radio"/> 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> <u>2</u>			
Temperature (°C): <u>Amb</u> <u>Amb</u>			
No. of custody seals on cooler: <u>1</u> <u>1</u>			
External µR/hr reading: <u>13</u> <u>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 ARE SAT EXTRACTS

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

Project Manager Signature / Date: Quoy 2/24/15

1502411

13-1 Amb

<p>From: (719) 563-5591 Peter Glendon Colo. Oil & Gas Div. Comm. 273 Commerce DR Thibault, CO 81082</p>	<p>Origin ID: PUEN</p>	<p>Ship Date: 23 FEB 15 Airtel: 430 LB CNO: 4076430NET3018</p>
<p>SHIP TO: 899 488-1511 Amy Wolf ALLS Laboratory Group 225 COMMERCE DR FORT COLLINS, CO 80524</p>	<p>SHIP TO: 899 488-1511 Amy Wolf ALLS Laboratory Group 225 COMMERCE DR FORT COLLINS, CO 80524</p>	<p>Delivery Address Bar Code</p>
<p>7725 0957 4000 7725 0957 4000</p>	<p>2 of 2</p>	<p>TUE - 24 FEB 10:30A PRIORITY OVERNIGHT</p>
<p>72 FTCA</p>	<p>80524 DEN</p>	<p>SHIP TO: 899 488-1511 Amy Wolf ALLS Laboratory Group 225 COMMERCE DR FORT COLLINS, CO 80524</p>

RT 614 1 10:30 A 4600 02 2

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*

Date Printed: Monday, March 02, 2015

ALS Environmental -- FC

Page 1 of 1

LIMS Version: 6.749

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

Field ID:	321192 W Gibson 1-25	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-15	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-16	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-17	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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

Field ID:	321199 E Fullbright 1-20	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-18	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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

Field ID:	321199 Back Fullbright 1-20	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-19	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-20	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-21	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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-	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-22	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-23	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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

Field ID:	321165 TB Thompson Jeffre	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-24	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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

Field ID:	321165 Back Thompson Jef	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-25	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-26	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-27	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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	Sample Matrix:	SatExtract	Prep Batch:	IP150226-20	Analyst:	Steve Workman
Lab ID:	1502411-28	% Moisture:	N/A	QCBatchID:	IP150226-20-1	Sample Aliquot:	5 ML
		Date Collected:	20-Feb-15	Run ID:	IT150225-1A1	Final Volume:	5 ML
		Date Extracted:	25-Feb-15	Cleanup:	NONE	Result Units:	MG/L
		Date Analyzed:	25-Feb-15	Basis:	As Received	Clean DF:	1
		Prep Method:	SW3010 Rev A	File Name:	150225A.		

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*