

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

07/11/2017

Submitted Date:

07/14/2017

Document Number:

682402392**FIELD INSPECTION FORM**Loc ID 445191 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 100322Name of Operator: NOBLE ENERGY INCAddress: 1625 BROADWAY STE 2200City: DENVER State: CO Zip: 80202**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
-
- ☒
- FOLLOW UP INSPECTION REQUIRED
-
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

Findings:8 Number of Comments4 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
,		NBL_DJBU_Inspections@NB LENERGY.COM	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
445192	WELL	DG	02/03/2017		123-42938	Kramer Federal LC22-725	RI
445193	WELL	DG	01/28/2017		123-42939	Kramer Federal LC22-720	RI

General Comment:

This is a follow up stormwater and reclamation inspection to FIR Document #682401548. It should be noted this location was associated with a Warning Letter (Document #401193990) that was sent to the Operator on January 25, 2017 because the Operator failed to install BMPs prior to, or at the beginning of, construction. See the Stormwater section and COGCC Comments section for additional information.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	Weedy, annual Russian thistle (<i>Salsola tragus</i>) and Kochia (<i>Kochia scoparia</i>) were observed throughout most disturbance areas, including topsoil stockpiles. Operator needs to control and manage both Russian thistle and Kochia using the best available practices, as this is weed waste and will spread onto adjacent lands. At maturity, Russian thistle often breaks off at the soil line and tumble long distances with the wind, widely dispersing seed for several kilometers (Stallings et al. 1995). Seed remains viable 2-3 years (Larimer County 5th Edition Weed Management Reference Guide).		
Corrective Action:	Comply with Rule 603.f. to control and manage weedy, annual vegetation to prevent weed waste and prevent spread of dispersing seeds onto adjacent lands.		Date: <u>07/28/2017</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>445192</u>	Type:	<u>WELL</u>	API Number:	<u>123-42938</u>	Status:	<u>DG</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>445193</u>	Type:	<u>WELL</u>	API Number:	<u>123-42939</u>	Status:	<u>DG</u>	Insp. Status:	<u>RI</u>

Reclamation - Storm Water - Pit**Interim Reclamation:**

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

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

The topsoil stockpile has significant weed cover including Russian thistle and Kochia with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth.

Corrective Action _____

Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles by 7/28/2017. Seeding is a best management practice to prevent weed establishment and accomplishes interim reclamation requirements. Seed the topsoil stockpiles during the next favorable seeding season.

Date **07/28/2017**

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

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

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: _____

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

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

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____ Fail _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment

Vegetation in portions of the interim reclamation area is predominantly undesirable weedy plant species, Russian thistle and Kochia, and is likely hindering the establishment of desirable vegetation. These areas will need to be reseeded to establish a uniform vegetation cover of at least eighty (80) percent of reference area levels.

Corrective Action

Perform reclamation in portions of the interim reclamation area in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

Date **10/16/2017**Overall Interim Reclamation **Fail****Final Reclamation/ Abandoned Location:**

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

Final Land Use: **RANGELAND**

Reminder: _____

Comment: _____

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

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

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

Compaction alleviation _____ Dust and erosion control _____

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

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: Corrective Action:

Date _____

Overall Final Reclamation

Well Release on Active Location ☐Multi-Well Location ☐**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Berms	Fail					18" berm on pads not properly compacted
Tracking Pad	Fail					Only a cattle guard
Hydro Mulch	In Process					
Sediment Traps	Fail					

Comment: Noble Energy (Operator) does not appear to have implemented and maintained Best Management Practices (BMPs) to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation per Rule 1002.f.(2). Operator does not appear to have implemented BMPs in accordance with good engineering practices per Rule 1002.f.(2). Sediment discharge was observed along the southern perimeter of the location. See attached inspection photos for more details.

Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. See COGCC Comments for addition details.

Date: 08/11/2017

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
Per this inspection, stormwater controls were inadequate and the Operator has not installed sediment traps or other BMPs in accordance to their own BMP Manual. The Operator has failed to implement their suggested BMP specifications. For example, the two sediment traps installed for this location (totaling 6.4 acres of disturbance) have a sediment trap volume capacity for both dry and wet storage that equals approximately 144 ft ³ . Based off Noble's own BMP Manual, the required sediment trap volume for one acre is 3,600 ft ³ . Therefore, based off Nobles BMP Manual, the sediment trap volume for the entire location would require approximately 23,040 ft ³ of sediment trap volume.	binschusc	07/13/2017

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

Document Num	Description	URL
682402397	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197828