

**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:

682402391**FIELD INSPECTION FORM**

Loc ID 445209	Inspector Name: Binschus, Chris	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 11 Number of Comments 4 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: <u>100322</u> Name of Operator: <u>NOBLE ENERGY INC</u> Address: <u>1625 BROADWAY STE 2200</u> City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>				

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
445203	WELL	DG	01/23/2017		123-42948	Holliday Federal LC23-785	RI
445204	WELL	DG	01/12/2017		123-42949	Holliday Federal LC23-775	RI
445205	WELL	DG	01/19/2017		123-42950	Holliday Federal LC23-780	RI
445206	WELL	DG	01/19/2017		123-42951	Tombstone Federal LC23-765	RI
445207	WELL	DG	01/14/2017		123-42952	Tombstone Federal LC23-760	RI
445208	WELL	DG	01/04/2017		123-42953	Tombstone Federal LC23-755	RI

General Comment:

This is a follow up stormwater and reclamation inspection to FIR Document #682401989. Also, this is in response to FIRR Document #401277395, stating "Noble Energy completed repairs on BMPs installed as per Noble's BMP Manual". 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. If corrective actions from the previous inspection report remain unresolved, corrective action dates will remain unchanged.

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		
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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>445203</u>	Type: <u>WELL</u>	API Number: <u>123-42948</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>445204</u>	Type: <u>WELL</u>	API Number: <u>123-42949</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>445205</u>	Type: <u>WELL</u>	API Number: <u>123-42950</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>445206</u>	Type: <u>WELL</u>	API Number: <u>123-42951</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>445207</u>	Type: <u>WELL</u>	API Number: <u>123-42952</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>445208</u>	Type: <u>WELL</u>	API Number: <u>123-42953</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 _____

All topsoil stockpiles have 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 _____ In Process _____

Comment _____

The access point identified in the previous inspection is actually the flowline ROW.

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 cattle guards and in need of maintenance
Hydro Mulch	In Process					
Waddles	Fail					Improperly installed-see photos for details
Silt Fences	Fail					Improperly installed-see photos for details
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 southeast Tombstone pad. See attached inspection photos for more details. Previous inspection noted BMPs have not been properly installed to control stormwater runoff from portions of the location. During the current inspection (7/11/2017), these issues were still observed.

Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective actions from the previous inspection were not resolved therefore the corrective action dates on this inspection remain the same from the previous inspections. See COGCC Comments for addition details.

Date: 05/09/2017

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

Comment	User	Date
Noble sent in FIRR Document #401277395 stating that "Noble Energy completed repairs on BMPs installed as per Noble's BMP Manual". 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 five sediment traps installed for this location (totaling 13.30 acres of disturbance) have a sediment trap volume capacity for both dry and wet storage that equals approximately 182 ft3. Based off Noble's own BMP Manual, the required sediment trap volume for one acre is 3,600 ft3. Therefore, based off Nobles BMP Manual, the sediment trap volume for the entire location would require approximately 47,880 ft3 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
401342092	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197831
682402396	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197827