

**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:

01/03/2018

Submitted Date:

01/04/2018

Document Number:

682403163**FIELD INSPECTION FORM**Loc ID 438066 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10611Name of Operator: LONGS PEAK RESOURCES LLCAddress: 2323 S SHEPHERD SUITE 1150City: HOUSTON State: TX Zip: 77019**Status Summary:**

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

Findings:

- 11 Number of Comments
-
- 2 Number of Corrective Actions

☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		dclarkson@vrtxep.com	
		egeiser@juncap.com	
		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
438065	WELL	SI	10/01/2017	OW	123-39863	RAILAY 28-3-1CH	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater inspection to Field Inspection Report Document #682402874 and in response to Field Inspection Report Resolution Document #401461889 stating that corrective actions have been performed. Where corrective actions from the previous inspection report remain unresolved, corrective action dates remain unchanged. This location is being referred to Enforcement- see the Interim Reclamation comment section. COGCC staff will also evaluate the Operator's compliance under Rule 1002.f. (2). for Enforcement, as there have been multiple corrective actions for the Operator to install or repair required BMPs in accordance with good engineering practices.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment observed along the eastern location. Refer to the attached inspections photos for more detail.		
Corrective Action:	Comply with Rule 603.f .	Date:	02/01/2018
Type	WEEDS		
Comment:	Appears the Operator has removed/managed the Russian thistle to prevent weed waste and to prevent the spread dispersing seeds onto adjacent lands.		
Corrective Action:		Date:	

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:	438065	Type:	WELL	API Number:	123-39863	Status:	SI	Insp. Status:	RI

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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 _____

Comment _____

Corrective Action _____

Date _____

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? Fail Production areas stabilized ? In
- 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 _____

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

Operator has failed to submit the variance request to delay interim reclamation using the NTO guidance for Interim Reclamation Procedures for Delayed Operations. The variance request Document #401228000 and its attachments were pushed back into draft on May 15, 2017. Operator has not submitted the corrections on the required documents for the variance request as of January 4, 2018. This matter is being forwarded onto Enforcement.

Corrective Action

Date _____

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 <input type="checkbox"/>	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
Sediment Traps	Fail					Not properly installed
Blankets	Fail					Not properly installed
Berms	Fail					Not properly stabilized
Ditches	Fail					In need of maintenance

Comment: Based on these inspection observations, the Operator has made some repairs to stormwater BMPs but has not addressed all issues identified in the previous inspection. Appears the Operator has made improvements to the sediment trap (enlarged the depth and improved the embankment berms). However, the outfall of the sediment trap is higher than the ditches; therefore, the sediment trap would not properly function. Operator has not improved the rock material that has been haphazardly installed as what appears to be a berm BMP along the southwestern well pad location. Sediment in the ditch BMP is blocking the path that will not allow stormwater flows to travel to the western sediment trap. Erosion blankets have not been repaired.

Corrective Action: Install or repair required BMPs in accordance with good engineering practices per Rule 1002.f.(2) Corrective actions from the previous inspection were not resolved; therefore, the corrective action date on this inspection remain the same from the previous inspection.

Date: 08/17/2017

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
This is the second consecutive corrective action inspection where the Operator has not addressed or repaired all stormwater BMPs identified in the previous inspections.	binschusc	01/04/2018
This is the seventh consecutive corrective action inspection regarding stormwater management requirements under Rule 1002.f.(2).	binschusc	01/04/2018

Attached Documents

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

Document Num	Description	URL
401503408	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4346584
401503448	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4341298
682403165	Inspection Photos	InspectionPhotos_438066.pdf