From: Denise Arthur - DNR
To: Amanda Blanchard; Catherine Roy - DNR
Cc: Brenda Lamiroy; Bud Guffey; Eric Sanford; Shaun Kellerby - DNR; Labowskie - DNR, Steve; Margaret Ash - DNR
Subject: RE: FW: COGCC FIELD INSPECTION REPORT [Doc#680602285, Loc Id: 428197 Name: Eck 12-90-1 428197] SUBMITTED NOTICE
Date: Tuesday, December 12, 2017 5:00:38 PM

Ms. Blanchard,

In reference to your e-mail response below to Catherine Roy, my second e-mail only clarified that COGCC was giving SG a CA extension due to possible weather delays, the e-mail directly related to the CA extension for long-term solutions. It appears you took this e-mail out of context in your e-mail to Catherine. The CAs (See the COAs for the extension) for the temporary BMPS were not met and there were no weather or altitude concerns to prevent SG from conducting the CA for the temporary controls. It appears that even the long-term controls could have been implemented. My inspectors look at results not verbal communications in the field. It was clear from the inspection that the CA was not conducted, nor was it in process, and it was overdue. Catherine's inspection report was written with true and current observations. We are considering recommending this site for enforcement, therefore I recommend that SG conducts the CAs as soon as possible.

Regards , Denise

Denise T Arthur Ph.D.
Reclamation Supervisor
Colorado Oil and Gas Conservation Commission
1120 lincoln Street Suite 801
Denver Colorado 80203

Office 303 894-2100 Ext 5195

From: Amanda Blanchard [mailto:ablanchard@sginterests.com]
Sent: Tuesday, December 12, 2017 3:12 PM
To: Roy - DNR, Catherine <catherine.roy@state.co.us>; Denise Arthur - DNR <Denise.Arthur@state.co.us>
Cc: Brenda Lamiroy <blamiroy@sginterests.com>; Bud Guffey <bguffey@sginterests.com>; Eric Sanford <esanford@sginterests.com>
Subject: RE: FW: COGCC FIELD INSPECTION REPORT [Doc#680602285, Loc Id: 428197 Name: Eck 12-90-1 428197] SUBMITTED NOTICE

Ms. Roy,

The email chain requesting the delay of the CA also mentions from Denise: "*I meant to include that the extension is also based on the weather constraints due to the time of year and the altitude*" this was in response of my concern that "*I will get my crew to see if we can order and get some BMPs installed by 11/30*." See attached email chain. At this point I made the assumption the CA to install BMPs by 11/30 was based on weather constraints and time of year and the altitude and no longer by 11/30. All of these constraints have affected our ability to install the BMPs by 11/30.

Further, I've apologized to Curtis as I inadvertently mixed up all my inspectors – my apologies to others affected as well.

You are correct, we did not discuss CA timing nor did you approve an extension, however we did discuss this CA and our efforts to address it. The report appears as though we haven't even thought about it. As you are aware and discussed onsite, we brought a backhoe to the location and determined the fence was too close to the cut-slope to safely access the slope. We also discovered there was an existing diversion ditch above the cut-slope. You are also aware that we have plans in the works (evaluating Jute matting). It is unfortunate the way the inspection report is written to appear as though we are not addressing this issue. As I mentioned in the request, we want to be sure our efforts will work.

Again, my apologies for addressing the email to Curtis. I will be sure to double check my message prior to sending.

Will COGCC keep the 11/30 CA deadline? Even with knowing our efforts to address this issue?

Regards,
Amanda

From: Roy - DNR, Catherine [mailto:catherine.roy@state.co.us]
Sent: Tuesday, December 12, 2017 2:56 PM
To: Amanda Blanchard; Denise Arthur - DNR
Cc: Brenda Lamiroy; Bud Guffey; Eric Sanford
Subject: Fwd: FW: COGCC FIELD INSPECTION REPORT [Doc#680602285, Loc Id: 428197 Name: Eck 12-90-1 428197] SUBMITTED NOTICE

Ms. Blanchard,

The request you made for an extension to the corrective action date does not satisfy the need to conduct the corrective action by the due date. As mentioned in the inspection report submitted yesterday, a delay for long-term stabilization on the cut-slope was extended to May 30, 2018 with the condition that temporary controls would be installed by the corrective action date. As a matter of clarification, the extension approved by Denise is for long term stabilization on the slope and is not technically a delay to the stormwater corrective action. See email sent November 16, 2017 with the condition of approval for the request.

Further, in your email to Curtis Conklin you mentioned that we discussed the stormwater corrective action during the meeting on 12/5. I need to clarify that we did not discuss corrective action timing nor would I approve an extension in that forum.

For future correspondence or questions regarding an inspection that I conducted, please contact me or my supervisor, Denise Arthur.

Thank you,

Catherine Roy

---------- Forwarded message ----------
From: **Conklin - DNR, Curtis** <curtis.conklin@state.co.us>
Date: Mon, Dec 11, 2017 at 1:29 PM
Subject: Re: COGCC FIELD INSPECTION REPORT [Doc#680602285, Loc Id: 428197 Name: Eck 12-90-1 428197] SUBMITTED NOTICE
To: Amanda Blanchard <ablanchard@sginterests.com>, Denise Arthur - DNR <Denise.Arthur@state.co.us>, Shaun Kellerby - DNR <shaun.kellerby@state.co.us>
Cc: Brenda Lamiroy <blamiroy@sginterests.com>, Bud Guffey <bguffey@sginterests.com>, Eric Sanford <esanford@sginterests.com>

Amanda,

You would need to speak with Catherine, as she is the one who did the inspection, or Denise.

Please direct any questions you have this week about inspections through my supervisor Shaun Kellerby. I will be out of the office the rest of the week do to a family emergency.

Regards,

On Mon, Dec 11, 2017 at 1:22 PM, Amanda Blanchard <ablanchard@sginterests.com> wrote:

> Hi Curtis, I'm traveling today, but wanted to touch base about this inspection. The stormwater corrective action has been delayed per Denise. We also discussed with Catherine. Why isn't that reflected on this report? It appears on the report that we neglected to do anything and this is incorrect. I spent a lot of time

requesting a delay, and it was approved with coas. I can call to discuss with you tomorrow.

Thanks

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On Mon, Dec 11, 2017 at 12:13 PM -0800, "COGCC Field Inspection Report" <Catherine.Roy@state.co.us> wrote:

> **Colorado**
> **Oil & Gas Conservation Commission**
> **Department of Natural Resources**
>
> 1120 Lincoln St. Suite 801
> Denver, CO 80203
>
> Phone: (303) 894-2100
>
> FAX: (303) 894-2109
>
> cogcc.state.co.us
>
> **COGCC Field Inspection Report**
>
> ATTACHED REPORT HAS BEEN SUBMITTED TO COGCC DATABASE BASED ON FIELD INSPECTION RESULTS. OPERATORS HAVE SEVEN (7) DAYS TO REVIEW BEFORE THE INSPECTION FORM IS POSTED TO THE WEBSITE.
>
> PLEASE REVIEW ENTIRE REPORT. **COMMENTS** ARE HIGHLIGHTED IN **BLUE**, **CORRECTIVE ACTION ITEMS** ARE HIGHLIGHTED IN **RED**.

--

Curtis Conklin, NW Field Inspector

C (970) 986-7314 | **P** (970) 487-3888

Collbran, CO 81624

curtis.conklin@state.co.us | www.colorado.gov/cogcc

--

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--

Catherine Roy
Southwest Reclamation Specialist

COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

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1120 Lincoln Street, Suite 801, Denver, CO 80203 catherine.roy@state.co.us | www.colorado.gov/cogcc