

**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:

06/27/2018

Submitted Date:

06/29/2018

Document Number:

682403732**FIELD INSPECTION FORM**
 Loc ID 436824 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 10459Name of Operator: EXTRACTION OIL & GAS INCAddress: 370 17TH STREET SUITE 5300City: DENVER State: CO Zip: 80202**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**14 Number of Comments7 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

| Contact Name  | Phone | Email                                 | Comment                    |
|---------------|-------|---------------------------------------|----------------------------|
|               |       | Mimi.Larsen@coag.gov                  | Assistant Attorney General |
| Andrews, Doug |       | doug.andrews@state.co.us              |                            |
| ,             |       | COGCCInspections@extracti<br>onog.com | All inspections            |
| ,             |       | dnr_cogccenforcement@state<br>.co.us  | COGCC Enforcement          |

**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|---------|---------------|-------------|
| 436824      | LOCATION | AC     |             |            | -       | Triple Creek  | RI          |

**General Comment:**

This inspection is in response to a complaint regarding reclamation and erosion. See complaint section for more details.

This inspection is being entered for compliance notification and documentation purposes only. This inspection is not intended to provide the operator the opportunity to resolve the alleged violations; documented below, without the possible imposition of a penalty, pursuant to Rule 522.c.(1). Instead, Staff will be following up on this inspection with COGCC enforcement staff and corrective action dates will not be applied to this inspection.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

|                    |   |       |  |
|--------------------|---|-------|--|
| Type               | TRASH   |       |  |
| Comment:           | Trash was observed along the southeastern perimeter of the location. Refer to the attached inspection photos for more detail.   |       |  |
| Corrective Action: | Perform the corrective action immediately to avoid potential increases in penalties.  | Date: |  |
| Type               | WEEDS   |       |  |
| Comment:           | Weed debris (Kochia weeds) was observed along portions of the perimeter. Appears the Operator has mowed portions of the location but will need to perform additional maintenance once the sound wall has been removed.                    |       |  |
| Corrective Action: | Perform the corrective action immediately to avoid potential increases in penalties.  | Date: |  |
| Type               | WEEDS   |       |  |
| Comment:           | Musk thistle, a List B Colorado Noxious weed, was observed along portions of the location. Appears the Operator has recently performed noxious weed management; however, some individual species still need to be controlled and managed. |       |  |
| Corrective Action: | Perform the corrective action immediately to avoid potential increases in penalties.  | Date: |  |

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: |

**Location Construction**

Location ID: 436824 CDP: \_\_\_\_\_

Comment: A total disturbance area of 19.20 acres was mapped on 6/27/2018 using a Trimble Juno 3B handheld device; this appears to be in compliance with the approved Form 2A for the permitted disturbance area. Note: There are additional disturbances (equipment rutting and compaction) due to sound wall removal outside of the permitted area along the west, east and northeastern areas.

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

**Form 2A COAs:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

**Wildlife BMPs:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

**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:

\_\_\_\_\_

**Inspected Facilities**Facility ID: 436824 Type: LOCATION API Number: - Status: AC Insp. Status: RI**Complaint**

Comment:

Complaint #: 200446001  
Field Inspector Assigned: Chris Binschus  
Location #: 436824  
Inspection Document #: 682403732  
Nature of complaint: Reclamation and Erosion  
Inspection Observations: An inspection of the above location was conducted with focus on interim reclamation and erosion. Complainant had concerns about project timing (interim reclamation), exposed soil, and erosion. Based on field observations by COGCC Staff, Operator failed to comply with Rule 1002 and 1003.

Corrective Action:

Date:

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

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: IMPROVED PASTURE

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 \_\_\_\_\_

This location is not in compliance with Rule 1002.c. Operator has failed to protect topsoil from erosion, compaction, and weed establishment. Erosion was observed along the north-facing slope; vehicle and equipment traffic was evident on top of the topsoil stockpile; cheatgrass has established on the stockpile, mainly the south-facing slope.

Corrective Action \_\_\_\_\_

Perform the corrective action immediately to avoid potential increases in penalties.

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

This location is not in compliance with Rule 1002.e. Rill and gully erosion were observed along the northern fill slopes, eastern earthen berm, and the topsoil stockpile that has not been maintained to reasonably minimize erosion and site degradation.

Corrective Action \_\_\_\_\_

Perform the corrective action immediately to avoid potential increases in penalties.

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 ? Fail  
 1003c. Compacted areas have been cross ripped? Fail  
 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? Fail  
 Production areas have been stabilized? Fail Segregated soils have been replaced? Fail

**RESTORATION AND REVEGETATION**Cropland

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

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? F

Comment

COGCC Staff conducted a review of the well files for the Triple Creek location and found that Operator reported all twenty-two approved wells as on production starting in or before December 2017 and continuing through the most recent reported month (April 2018). The latest Date of First Production for wells on the location was December 21, 2017, (API 05-123-43505, -43506, and -43508), indicating that no ongoing operations are required at the Location as of that date. Because the Location is on cropland, Operator was required to perform interim reclamation no later than March 21, 2018.

Based on field observations from June 27, 2018, the Operator has failed to perform interim reclamation by the required date.

Corrective Action

Perform the corrective action immediately to avoid potential increases in penalties.

Date \_\_\_\_\_

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_

Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: IMPROVED PASTURE

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
|                  |                 |                         |                       |               |                          |         |

Comment: Sediment discharge was observed along two northern discharge points. Stormwater BMP maintenance is required immediately, as many of the BMPs are in need of repair, including straw wattles along the main access road.

Corrective Action: Perform the corrective action immediately to avoid potential increases in penalties.

Date: \_\_\_\_\_

Pits: ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

| Comment  | User      | Date       |
|--|-----------|------------|
| Document #401557409 (As-Built Facility Layout Drawing) does not accurately represent the total disturbance area. This observation has been forwarded onto OGLA staff for further review. | binschusc | 06/29/2018 |

**Attached Documents**

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 682403739    | Inspection Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4511199">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4511199</a> |