

**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:

08/24/2018

Submitted Date:

08/27/2018

Document Number:

682403913

**FIELD INSPECTION FORM**

Loc ID 440281 Inspector Name: Binschus, Chris On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 10373  
Name of Operator: NGL WATER SOLUTIONS DJ LLC  
Address: 3773 CHERRY CRK NORTH DR #1000  
City: DENVER State: CO Zip: 80209

**Findings:**

- 7 Number of Comments
- 3 Number of Corrective Actions
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
		joseph.vargo@nglep.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
440283	WELL	SI	02/15/2018	DSPW	123-40771	NGL C9C	RI

**General Comment:**

This is an Interim Reclamation and Stormwater inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.

**Inspected Facilities**

Facility ID: 440283 Type: WELL API Number: 123-40771 Status: SI Insp. Status: RI

**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 Form 2A stated that fencing was not needed due to remote location.  
 Note: Cattle are degrading the location and could be a potential safety hazard. Operator may want to reconsider putting some type of barrier to exclude cattle.

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

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment This location is not in compliance with Reclamation rules. Rule 1002.b.(2) states all excavation operations undertaken after July 1, 1997 on non-crop land shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper, and mark or document stockpile locations to facilitate subsequent reclamation.  
 Appears the Operator has not salvaged a sufficient amount of topsoil to facilitate subsequent reclamation. Refer to the attached inspection photos.

Corrective Action Submit the following results with GPS coordinates of each sample via Form 4 Sundry Notice. Locations of all soil samples shall be included on a figure depicting the soil sample locations overlaid on aerial imagery. See COGCC Comments section for additional compliance information regarding soil samples.  
 a) 2 soil samples from the topsoil stockpile  
 b) 3 reference topsoil samples from the nearby adjacent land  
 c) 3 soil pits estimating topsoil depth taken from the nearby adjacent land  
 d) Map the total disturbance area of the well location overlaid on aerial imagery  
 e) Report how much topsoil is currently stored and salvaged  
 Note: COGCC will be conducting its own assessment of the above requested items to confirm accuracy.

Date 09/24/2018

1002c. PROTECTION OF SOILS Fail

Comment This location is not in compliance with Reclamation rules. Rule 1002.c. states all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.  
 Operator has failed to properly protect the topsoil from degradation due to erosion and failed to prevent weed establishment. Appears cattle have also degraded the topsoil.

Corrective Action Best management practices to prevent weed establishment and stabilization of the topsoil shall be implemented. Control, manage, and prevent weedy, annual vegetation on the topsoil stockpile.  
 Note: Operator should consider seeding as an option for long-term protection and stabilization of topsoil.

Date 09/24/2018

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 REVEGETATION

Cropland

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 

Location is planned for 2 injection wells but only 1 has been drilled. If the Operator does not commence operations to drill the second well within 6 months of the first reported injection start date (7/30/18; Form 5A Doc.# 401719894), then the Operator shall perform interim reclamation activities to reduce disturbance areas only needed for production operations.

If the Operator plans to drill the second injection well but after 6 months from 7/30/18, then Operator shall submit an additional financial assurance bond per the Interim Reclamation Procedures for Delayed Operations (Notice to Operators dated 1/5/2017).

A follow-up interim reclamation inspection will be conducted at a future date to ensure compliance with Reclamation rules.

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**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
Silt Fences	Fail					

Comment: This location is not in compliance with Reclamation rules. Rule 1002.f. states Operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004.

Operator has not maintained the installed stormwater BMP (silt fence). Rill erosion was observed along portions of the perimeter of the location. Fill slopes are not adequately stabilized to minimize erosion, transport of sediment offsite, and site degradation.

Corrective Action: **Install or repair required BMPs per Rule 1002.f. and properly stabilize fill slopes in accordance with good engineering practices.**

Date: 09/24/2018

Pits:  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
Soil samples: Operator shall provide the following agronomic soil properties for all samples taken in the soil analysis including, at a minimum: pH Saturated Paste, electrical conductivity (ec), organic matter, nitrate nitrogen, phosphorus, potassium, zinc, iron, manganese, copper, and lime and texture estimates, percent calcium carbonate equivalency, and SAR.	binschusc	08/27/2018

**Attached Documents**

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

Document Num	Description	URL
682403914	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4563412">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4563412</a>