

**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: _____

Operator Information:OGCC Operator Number: 10373Name of Operator: NGL WATER SOLUTIONS DJ LLCAddress: 3773 CHERRY CRK NORTH DR #1000City: DENVER State: CO Zip: 80209**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**7 Number of Comments3 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

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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 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.

Date **09/24/2018**

- 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.

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.

Date **09/24/2018**

Note: Operator should consider seeding as an option for long-term protection and stabilization of topsoil.

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 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 _____

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

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