

**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:

09/05/2018

Submitted Date:

09/06/2018

Document Number:

682403964**FIELD INSPECTION FORM**
 Loc ID 317876 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 39560Name of Operator: TOP OPERATING COMPANYAddress: 3609 S WADSWORTH BLVD STE 340City: LAKEWOOD State: CO Zip: 80235**Status Summary:**

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

**Findings:**8 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

| Contact Name      | Phone               | Email                            | Comment                    |
|-------------------|---------------------|----------------------------------|----------------------------|
|                   |                     | Mimi.Larsen@coag.gov             | Assistant Attorney General |
|                   |                     | dnr_cogccenforcement@state.co.us | COGCC Enforcement          |
| HERRING, PAUL     | (303) 727-9915      | paul.herring@topoperating.com    |                            |
| HERRING, MURRAY J | (303) 727-9915 x203 | murray.herring@topoperating.com  |                            |

**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num | Facility Name      | Insp Status |
|-------------|----------|--------|-------------|------------|---------|--------------------|-------------|
| 317876      | LOCATION | CL     |             |            | -       | KNOX-62N67W 23SWNW | RI          |

**General Comment:**

This is a follow-up Final Reclamation Inspection to Document #682403857- last inspected on 7/30/2018. Well was plugged and abandoned on 7/11/2013. Any corrective actions from previous inspections that have not been addressed are still applicable. Where corrective actions from the previous inspection report remain unresolved, corrective action dates remain unchanged.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

| Type | Area | Volume |  |  |
|------|------|--------|--|--|
|      |      |        |  |  |

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

| Type:              | #  |       | corrective date |
|--------------------|--|-------|-----------------|
| Comment:           | Copied from the previous inspection on 7/30/2018: Comply with the reclamation rules to remove (regardless of ownership) all equipment within three months of plugging (7/11/2013) the associated facility. All work should have been conducted by 10/11/2013. See Reclamation Section for corrective actions and corrective action dates. Refer to the attached inspection photos for more detail. |       |                 |
| Corrective Action: |  | Date: |                 |

**Venting:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Flaring:**

|                    |  |       |
|--------------------|--|-------|
| Type               |  |       |
| Comment:           |  |       |
| Corrective Action: |  | Date: |



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

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

Land Use: \_\_\_\_\_

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? \_\_\_\_\_ 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 \_\_\_\_\_

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

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

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

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

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

Well plugged Pass Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed Fail No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured Fail

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: Since the previous inspection on 7/30/2018, the surface owner has recently cultivated the ~30 acre parcel, including portions of this P&A location. However, Operator has failed to perform the previous corrective actions to re-contour disturbance areas to match the surrounding landscape and to remove all equipment. Equipment has been flagged and a recent "Locate" was performed. Unclear whether the "Locate" was conducted by the surface owner because of the recent cultivation or whether the Operator was responding to the corrective action.

|                           |  |                                 |                          |
|---------------------------|--|---------------------------------|--------------------------|
| Corrective Action:        | Comply with Rule 1004. Previous corrective actions remain unresolved; therefore, corrective action dates remain unchanged. | Date                            | 04/29/2016               |
| Overall Final Reclamation | Fail   | Well Release on Active Location | <input type="checkbox"/> |
|                           |  | Multi-Well Location             | <input type="checkbox"/> |

**COGCC Comments**

| Comment   | User      | Date       |
|---|-----------|------------|
| Copied from the previous inspection on 7/30/2018: Operator falsely submitted a Final Reclamation Complete Notice on 1/28/2016 (Doc. # 400979886), prior to a failing Final Reclamation Inspection on 1/29/2016 (Doc. # 681900497).              | binschusc | 09/06/2018 |
| Previous corrective action inspections:<br><br>1/29/2016 (Doc.# 681900497): Corrective Action- RECLAIM TANK BATTERY AND ASSOCIATED ACCESS ROAD. REMOVE GAS LINE .<br><br>7/30/2018 (Doc.# 682403857): Corrective Action- Comply with Rule 1004. | binschusc | 09/06/2018 |
| As part of complying with Rule 1004, Operator shall perform proper compaction alleviation by cross-ripping to a depth of eighteen (18") inches throughout all disturbance areas associated with this P&A location.                              | binschusc | 09/06/2018 |

**Attached Documents**

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

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 401756199    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572352">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572352</a> |
| 682403965    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572348">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572348</a> |