

**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:

12/12/2018

Submitted Date:

12/13/2018

Document Number:

682504269**FIELD INSPECTION FORM**
 Loc ID 433129 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10581Name of Operator: ABILENE PERFECT ENERGY JV LLCAddress: 4600 PECOS STREETCity: DENVER State: CO Zip: 80211**Status Summary:**

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

Findings:15 Number of Comments10 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
		steve.freese@state.co.us	
Gillette, Kira		kira.gillette@state.co.us	
		patricia@perfectenergy.us	
		charles@perfectenergy.us	
,		dnr_cogccenforcement@state.co.us	
		malick@perfectenergy.us	
		almc@perfectenergy.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
433121	WELL	PR	12/01/2015	SI	073-06540	Surprise 12-54-36-6	RI

General Comment:

This is a follow-up interim reclamation and stormwater inspection to inspection doc. #67313723 dated 8/5/2016, doc. #689900063 dated 07/28/2017, doc #682503283 dated 4/30/2018, doc #682503510 dated 6/19/2018 and doc. #68250330 dated 8/14/2018.

Any corrective action(s) from previous inspections that have not been addressed are still applicable. Due to outstanding corrective actions, this is being recommended for enforcement.

Location				
Lease Road:				
Type	Access			
comment:	Previous inspections documented that a fence has been constructed accross the access road (coordinates 38.94974 / -103.39839), forcing vehicle traffic off the road to utilize a gap in the corner of the fence to the east. Operator has been notified that a gate should be installed to minimize surface disturbance to areas off the access road. Operator has failed to mitigate and minimize surface disturbance in accordance to 1002.e(4)			
Corrective Action:	Install a gate to allow vehicle traffic to travel on access road.			Date: 07/11/2018
Overall Good: <input type="checkbox"/>				
Signs/Marker:				
Type	OTHER			
Comment:	Previous inspections documented that the lease road sign located at CR 26 had incorrect operator information and required operator to install sign to comply with Rule 210.e. Signage located at lease road and CR 26 remains uncorrected. Corrective action has not been addressed; corrective action and corrective action date remains applicable. This corrective action and date remains applicable.			
Corrective Action:	Install sign to comply with Rule 210.e.			Date: 10/10/2016
Type	WELLHEAD			
Comment:	At locked gate			
Corrective Action:				Date:
Type	TANK LABELS/PLACARDS			
Comment:	Previous inspections documented incomplete signage on the three (3) tanks at the battery without any signage, and required operator to install signage to comply with Rule 210.d. Signage remains incomplete and corrective action has not been addressed; corrective action and corrective action date remains applicable.			
Corrective Action:	Install sign to comply with Rule 210.d.			Date: 10/10/2016
Emergency Contact Number:				
Comment:				
Corrective Action:				Date: _____
Good Housekeeping:				
Type	STORAGE OF SUPL			
Comment:	Previous inspections documented unused equipment and various trash debris on the north side of the location and around pump unit and required it to be removed. Unused equipment/trash debris remains. Corrective action has not been addressed; corrective action and corrective action date remains applicable.			
Corrective Action:	Comply with Rule 603.f			Date: 10/30/2017
Type	STORAGE OF SUPL			
Comment:	Previous inspections documented a pile of gravel on the location and required it to be removed. Gravel and various debris remains on and throughout location. Corrective action has not been addressed; corrective action and corrective action date remains applicable.			
Corrective Action:	Comply with Rule 603.f			Date: 10/30/1027
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
	WELLHEAD			

Comment:	Previous inspections documented stained soil at wellhead and required operator to remove and/or remediate stained soil. Soils at wellhead have not been removed, or remediated. Stained soils can also be found in areas surrounding the well. Corrective action has not been addressed; corrective action and corrective action date remains applicable.	
Corrective Action:	Properly treat or dispose of oily waste in accordance with Rule 907.e. Contact area COGCC EPS	Date: 09/09/2017

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
	3		STEEL AST		38.961470,-103.399640
Comment:	Previous inspections documented that NFPA diamond labeling were missing on tanks. NFPA diamond labels remain missing from tanks. See Signs/Markers for corrective action				
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Previous inspections documented insufficient and inadequate berms around the tanks, that the berm on the northwest end of the tanks has not been installed. Berms or other secondary containment devices remain inadequate and missing. Corrective action has not been addressed; corrective action and corrective action date remains applicable.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 906.d(1).			Date: 09/09/2016

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: RANGELAND

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 _____ Fail _____

Comment

Previous inspections documented that that a fence has been constructed across the access road (coordinates 38.94974 / -103.39839), forcing vehicle traffic off the road to utilize a gap in the corner of the fence to the east. Operator has failed to construct a gate, and minimize surface disturbance to the constructed access road in accordance with 1002.e(4). See photos 24 and 25.

Corrective Action

Construct gate per corrective actions, comply with 1002.e(4) and restrict vehicle travel to the access road and conduct reclamation in accordance with 1000 rules on the disturbed areas where off-road traffic has occurred.

Date _____

1003a. Waste and Debris removed? _____

Comment

See "Good Housekeeping"

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment

See "Good Housekeeping"

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 ? Fail1003c. 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? FailProduction areas have been stabilized? Fail 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 Previous inspections documented that the production area and location are not stabilized, that areas on the west side of the pad have eroded and degraded. It was also documented that vegetation in the interim areas have not adequately established and required operator to perform additional reclamation in accordance to 1003. Erosion degradation remains evident on the western areas of the pad/location. Large areas of the interim remain bare and exposed soil. In addition compaction concerns have also been identified. Corrective action has not been addressed; corrective action and corrective action date remains applicable.

Corrective Action Perform reclamation in accordance to COGCC 1003 series rules including, but not limited to, re-contouring and repairing eroded areas of the pad and location, compaction alleviation and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this location.

Date 10/27/2017Overall Interim Reclamation Fail**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

Comment: Previous inspections documented erosion concerns to the southwest end of the wellhead and required erosion to be repaired, and stormwater and sediment control BMPs installed or repaired. Areas of erosion appears to have continued to worsen with further erosion encroachment onto the interim reclamation areas. Location remains unstabilized. In addition, the berm along the perimeter of the location has not been maintained and not in proper functioning condition; berm should have been reclaimed during interim reclamation. Corrective action has not been addressed; corrective action and corrective action date remains applicable.

Corrective Action: **Install or repair required BMPs per Rule 1002.f.**

Date: 09/09/2016

Pits: ☐ NO SURFACE INDICATION OF PIT**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
682504270	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4674990