

**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:

02/28/2019

Submitted Date:

03/08/2019

Document Number:

682404596**FIELD INSPECTION FORM**Loc ID 444377 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10071Name of Operator: HIGHPOINT OPERATING CORPORATIONAddress: 1099 18TH ST STE 2300City: DENVER State: CO Zip: 80202**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**ANY CORRECTIVE ACTION(S) FROM  
PREVIOUS INSPECTIONS THAT HAVE NOT  
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Singer, Sheila		ssinger@hpres.com	<a href="#">All Inspections</a>
Barber, Matt		mbarber@hpres.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
444377	LOCATION	AC			-	Fox Creek 28 SWSE	CI

**General Comment:**[This is a Construction and Stormwater Inspection in response to Form 42: Notice of construction- Document #401931002.](#)

### Location Construction

Location ID: 444377 CDP: \_\_\_\_\_

Comment: A total disturbance area of approximately 5.10 acres was mapped using a Trimble Juno 3B handheld device. This appears to be in compliance with the approved Form 2A for the permitted disturbance area.

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:

\_\_\_\_\_



**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

Fail

Comment

This location is not in compliance with Rule 1002.b.(2). Rule 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 soil sample via Form 4 Sundry Notice to the attention of Chris Binschus- Reclamation Specialist. Locations of all soil samples shall be included on a figure depicting the soil sample locations overlaid on aerial imagery.

1) Take 4-5 soil samples from the nearby adjacent reference area estimating topsoil depth. Provide photo documentation, with measurements, of the topsoil illustrating a clear soil profile of the topsoil layer and subsoil layer.  
2) Report how much topsoil is currently stored and salvaged.

Note: It is COGCC's expectation that the above topsoil analysis be performed prior to start of construction.

Date **04/05/2019**

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail

Comment

This location is not in compliance with Rule 1002.c. Operator is using topsoil as a berm BMP which is not protective of topsoil (see Photo 7). All topsoil should be salvaged and stored for the purposes of reclamation. Also, topsoil has not been properly stabilized. Note: Operator shall consider long-term stabilization BMPs when stabilizing all stockpiles to ensure compliance under Rule 1002.c.

Per Rule 1002, all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Per Rule 1002, BMPs to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Corrective Action

Comply with Rule 1002.b. to store all topsoil for the purposes of reclamation and properly stabilize the topsoil stockpile.

Date **03/15/2019**

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: 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: The location does not have a stabilized outlet structure installed. It is COGCC's expectation that a stabilized outlet structure be installed at all oil and gas locations.

The perimeter ditch BMP has not been constructed to a sufficient depth. The perimeter wattle BMP has not been staked. Berm material used as a perimeter BMP has not been stabilized. An unconsolidated berm BMP is not a proper functioning BMP, as the unconsolidated material becomes a source of potential pollution itself.

Corrective Action: Comply with Rule 1002.f. to properly install the above mentioned BMPs in accordance with good engineering practices.

In addition, perform one of the two following corrective actions:

- 1) Provide construction calculations from the site specific stormwater plan demonstrating that a stabilized outlet structure is not required, or
- 2) Install a stabilized outlet structure(s) in accordance with good engineering practices per Rule 1002.f.

Date: 04/05/2019

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
401965818	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756548">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756548</a>
682404597	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756542">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756542</a>