

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10071
Name of Operator: HIGHPOINT OPERATING CORPORATION
Address: 1099 18TH ST STE 2300
City: DENVER State: CO Zip: 80202

Findings:

- 7 Number of Comments
- 3 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	All Inspections
Barber, Matt		mbarber@hpres.com	All Inspections

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:

Inspected Facilities

Facility ID: 444377 Type: LOCATION API Number: - Status: AC Insp. Status: CI

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756548
682404597	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4756542