

**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:

05/06/2019

Submitted Date:

05/09/2019

Document Number:

696200013

**FIELD INSPECTION FORM**Loc ID 311709 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 65550

Name of Operator: OILFIELD SALVAGE &amp; SERVICE CO

Address: 5911 S MIDDLEFIELD RD

City: LITTLETON State: CO Zip: 80123

**Status Summary:**

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

**Findings:**

6 Number of Comments

2 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
,		dnr_cogccenforcement@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
		oilfieldsalvage@gmail.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
200049	WELL	PA	08/17/1995	DSPW	001-05051	NOONEN RANCH 10	RI
311709	LOCATION	CL			-	NOONEN RANCH-63S58W 18NWNW	RI

**General Comment:**

This is a follow-up, final reclamation and stormwater inspection to doc. #682501125, #682501478, doc. #675103751, doc. #682502970 and doc. #682503696

This inspection is to document compliance for the following corrective actions:

1004.a: Conduct reclamation by 12/18/2017

1002.f: Properly select, install and maintain required site specific stormwater and erosion controls in accordance with 1002.f and good engineering practices by 9/9/2016

Any corrective actions from previous inspections that have not been addressed area still applicable.

Inspected Facilities									
Facility ID:	200049	Type:	WELL	API Number:	001-05051	Status:	PA	Insp. Status:	RI
Facility ID:	311709	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI

**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 \_\_\_\_\_ 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 **Fail** \_\_\_\_\_

Non cropland: Revegetated 80% **Fail** \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present **Fail** \_\_\_\_\_ Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING RECLAMATION](#)

Corrective Action: \_\_\_\_\_ Date **12/18/2017**

Perform reclamation/remediation in accordance to COGCC 1000 series rules and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Recommend operator assess soil agronomic and possible compaction concerns. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed.

Overall Final Reclamation

Fail

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
Waddles	Fail					
Other	Fail					
Seeding	Fail					

Comment: SEE "COGCC COMMENTS" REGARDING STORMWATER

Corrective Action: Properly select, install and maintain required site specific stormwater and erosion controls in accordance with 1002.f and good engineering practices.

Date: 09/09/2016

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
<p><b>RECLAMATION COMMENTS</b></p> <p>Previous inspections required operator to perform remediation/reclamation, including establishing vegetation, stabilizing the site and ensuring erosion controls are implemented to stabilize the seeded soil. Previous reclamation activities were conducted and reclamation was placed "in process" in inspection #682502970, however concerns were identified and that additional reclamation will likely be required as no controls were implemented to stabilize the seeded soil, and what BMPs that were installed, were not installed in accordance with good engineering practices.</p> <p>Inspection #682503696 determined that the reclamation failed, that erosion degradation was allowed to continue and no desirable perennial vegetative germination was evident.</p> <p>On November 9th, 2018, Mr. Ross Unruh with Oil Field Salvage emailed inspector (see attached) stating additional remediation/reclamation was planned for April of 2019. Work planned included:</p> <p>Till location Till in straw/hay into contaminated area. Apply proper erosion controls Apply De Salt on surface Water in De Salt Re-Seed with straw</p> <p>Operator was notified that the corrective actions remain applicable and that the location will remain out of compliance until the corrective actions have been addressed.</p> <p>Upon this inspection, it remains evident that the existing stormwater and erosion control BMPs remain improperly installed and insufficient, that no additional BMPs have been installed with good engineering practices, that stormwater has been allowed to continue to cut under the wattles and erosion degradation has continued on the location with sediment transport off location evident. No additional reclamation or remediation work appears to have been conducted and the salt kill remains evident. Additionally, what appears to be a Scotch Thistle rosette is growing on location. This is a Colorado State listed noxious weed. Noxious weed management and monitoring will also be required. See attached photo document. Original corrective action and corrective action date remains in place.</p>	trujilloam	05/09/2019
<p>Due to the significant nature, extent, or duration of the alleged rule violation(s), this location is being referred for enforcement.</p>	trujilloam	05/09/2019

**STORMWATER COMMENTS**

trujilloam

05/09/2019

Previous inspections required operator to perform stormwater management and to properly select and install site specific stormwater and sediment control BMPs. Inspections also required (under final reclamation) operator to ensure erosion controls are implemented to stabilize the seeded soil.

Inspector visited the location in October 3rd, 2017 when work was being conducted on the site. It was noted that the area appeared to have been seeded and straw wattle ponding BMPs were being used as a control. However, it was also noted that no additional controls were implemented to stabilize the seeded soil per corrective action requirements under reclamation, and the straw wattle BMPs were not properly installed (trenched) in accordance with good engineering practice. Inspector contacted the operator (Mr. Unruh) immediately after making these observations and informed him that the seeded soil is at risk to both wind and stormwater erosion, and that BMPs will need to be correctly installed.

During follow-up inspections on 12/18/2017 and 8/2/2018, it was documented that no additional controls to stabilize the seeded soil have been implemented, and the straw wattle BMPs remain improperly installed and insufficient. Operator was notified by inspector via email on 12/26/2017 and 11/9/2018 that the controls remain insufficient.

Upon this inspection, no changes appear to have been conducted to the existing stormwater and erosion control BMPs; BMPs remain improperly installed and insufficient. No additional BMPs have been installed in accordance with good engineering practices and corrective actions. Stormwater has been allowed to continue to cut under the wattles and degradation has continued on the location with sediment transport off location evident. See attached photo document. Original corrective action and corrective action date remains in place.

**Attached Documents**

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

Document Num	Description	URL
402037854	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819288">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819288</a>
696200015	Email Correspondence	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819279">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819279</a>
696200016	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819280">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819280</a>