

**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:

07/10/2019

Submitted Date:

07/11/2019

Document Number:

696200389**FIELD INSPECTION FORM**
 Loc ID 330865 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**OGCC Operator Number: 10112Name of Operator: FOUNDATION ENERGY MANAGEMENT LLCAddress: 5057 KELLER SPRINGS RD STE 650City: ADDISON State: TX Zip: 75001**Status Summary:**

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

**Findings:**7 Number of Comments2 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 |                 |
| Gillette, Kira |       | kira.gillette@state.co.us        |                 |
| Evins, Bret    |       | bret.evins@state.co.us           |                 |
| ,              |       | regulatory@foundationenergy.com  | All Inspections |

**Inspected Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 199860      | WELL | AB     | 10/01/2014  | OW         | 123-19794 | State 36-3-9  | RI          |

**General Comment:**

This is a follow-up interim reclamation and stormwater inspection to inspection #682501617, 682501708, #682501790, #675103803, #682503197 and #682504574.

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

1003: Comply with Rule 1003 and conduct interim reclamation by 6/15/2017

1002.f: Install BMPs per rule 1002.f by 2/18/2017

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

**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:           | Equipment has been removed from the location. |       |                 |
| Corrective Action: |   | Date: |                 |

**Venting:**

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

**Flaring:**

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

| Inspected Facilities |   |       |      |             |           |         |    |               |    |
|----------------------|---|-------|------|-------------|-----------|---------|----|---------------|----|
| Facility ID:         | 199860  | Type: | WELL | API Number: | 123-19794 | Status: | AB | Insp. Status: | RI |
| Producing Well       |   |       |      |             |           |         |    |               |    |
| Comment:             | Well status TA, this is an interim reclamation and stormwater inspection. |       |      |             |           |         |    |               |    |
| 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? Fail 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? Fail

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 Fail Recontoured Fail 80% Revegetation Fail

## 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

Inspection Doc. #682501617, #682501708, #682501790, #675103803, #682503197 and #682504574 required operator to perform interim reclamation including, but not limited to, re-contouring and revegetating (reclaiming) all areas not reasonably needed for production per 1003 reclamation rules; Location does not meet reclamation regulations; The northern, western and southwest portions of the location do not appear to be necessary for production activities and remain unreclaimed per reclamation requirements. Vegetation remains predominantly undesirable weedy plant species such as russian thistle, kochia and Puncturevine.

Corrective Action

**ORIGINAL CORRECTIVE ACTION AND DATE REMAINS APPLICABLE. Perform reclamation. Re-contour, re-grade and reclaim areas not needed for production per 1003 reclamation rules; 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 that matches the adjacent pastureland or a seed mixture requested by the landowner. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site. Revegetation activities shall be completed no later than 6/15/2017**

Date 06/15/2017

## 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 \_\_\_\_\_

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 **06/15/2017**

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
|                  | Fail            |                         |                       |               |                          |         |

Comment: Inspection Doc. #682501617, 682501708, #682501790, #675103803, # 682503197 and #682504574 documented insufficient stormwater and sediment control BMPs in place; areas along the perimeter of the location experiencing degradation. These concerns will be mitigated during interim reclamation, however temporary BMPs need to be implemented to prevent further degradation. Inspections required operator to Install or repair required BMPs per rule 1002.f. by 2/18/2017. Erosion degradation remains evident, BMPs have not been installed. Original corrective action and corrective action date remains in place.

Corrective Action: **Install or repair required BMPs per rule 1002.f. in accordance to good engineering practices**

Date: 02/18/2017

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

#### **COGCC Comments**

| Comment   | User       | Date       |
|---|------------|------------|
| Operator indicated in email to inspector that well was on foundations "2019 Plug and Abandon list". Operator submitted form 4 #402074579 stating "The well will be evaluated during each TA renewal for opportunities to return it to production". No Form 6 intent for abandonment has been submitted or approved. | trujilloam | 07/11/2019 |
| Unable to find records indicating well will be plugged and abandoned as indicated by operator. Location remains subject to 1003 interim reclamation requirements.   |            |            |

#### **Attached Documents**

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

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 402105549    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875928">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875928</a> |
| 696200390    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875919">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875919</a> |
| 696200391    | Email correspondence | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875920">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875920</a> |