

**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:

08/14/2019

Submitted Date:

08/15/2019

Document Number:

696200588**FIELD INSPECTION FORM**Loc ID 414589 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10691Name of Operator: PHOENIX RESOURCES LLCAddress: 5566 S SYCAMORE STREETCity: LITTLETON State: CO Zip: 80120**Status Summary:**

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

Findings:9 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
		theffner@phxresources.com	
		jason.kosola@state.co.us	
		jeisenach@phxresources.com	
		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
414589	LOCATION	AC			-	MOSHER 1-1H	RI
414591	WELL	PR	01/01/2019	OW	073-06393	MOSHER 1-1H	RI
465663	SPILL OR RELEASE	CL	07/26/2019		-	Mosher 1-1H	RI

General Comment:

This is a follow-up interim reclamation and stormwater inspection.

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

603.f: Remove and dispose of trash debris

603.f: Removal of equipment not needed for production.

906.d.(1): Ensure secondary containment (berms) are sufficiently impervious to contain discharged material and remove vegetation establishing on berms.

907.e: Clean stained soils from location and contact EPS

1002.f: Remove containers/buckets/jugs or install BMPs/Place into secondary containment.

1003: Perform interim reclamation on areas not needed for production.

It was observed that trash debris and equipment not needed for production have been removed from the location. Various containers/buckets/jugs have been removed from the location or placed into secondary containment. Berms have been repaired and appear impervious to contain discharged material.

It was also observed that stained soils on location remain evident and have not been properly cleaned/remediated, or removed. Interim reclamation on areas not needed for production have not been conducted.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Previous inspections documented various trash debris including empty buckets, pipe, funnels, straw wattles, etc... observed throughout location and required operator to properly remove and dispose.		
	Trash debris has been removed from location. This corrective action has been addressed.		
Corrective Action:		Date:	
Type	UNUSED EQUIPMENT		
Comment:	Previous inspections documented unused equipment throughout location and production area, and that location appears to be in use as a storage yard. Inspection required operator to remove all unused equipment, and equipment not needed for production on the location by 9/20/2018.		
	Unused equipment, and equipment not needed for production has been removed from the location. This corrective action has been addressed.		
Corrective Action:		Date:	

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected FacilitiesFacility ID: 414589 Type: LOCATION API Number: - Status: AC Insp. Status: RIFacility ID: 414591 Type: WELL API Number: 073-06393 Status: PR Insp. Status: RIFacility ID: 465663 Type: SPILL OR API Number: - Status: CL Insp. Status: RI

Environmental**Spill/Remediation:****Comment:**

Previous inspections documented stained soils by separator, pumping unit, base of tanks at battery, areas where chemical filled buckets were stored, and a pile E&P Waste on the north side of location. Inspections required operator to properly treat or dispose of oily waste and stained soils in accordance with Rule 907.e., and to contact area COGCC EPS.

Inspection #697000020 required stained soils due to a spill at wellhead to be cleaned by 7/21/2019.

Work appears to have been conducted as E&P waste appears to have been removed and stained soils around some equipment appears to have been cleaned.

However, it was observed that stained soils at and around the well head have not been sufficiently treated or removed. A noticeable chemical odor also evident within soils sub-surface of the spill area. Additionally, stained soils in areas where chemical filled buckets were stored on the northeast end of the location remain evident.

See photos 4-7, and 11 in the attached photo document.

Corrective action from inspection #696200296 requiring Operator to properly treat or dispose of stained soils on location by 6/1/2018 remains applicable.

Corrective action from inspection #697000020 requiring Operator clean stained soils due to spill by 6/22/2019 remains applicable.

Corrective Action:

Properly treat or dispose of waste and stained soils on location in accordance with Rule 907.e by 6/1/2018 per CAs from inspection #696200296

Properly clean/treat stained soils from the well, and areas around well by 7/1/2019 per CAs from inspection #697000020

Date: 06/01/2018

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

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 _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? PassComment [See "Good Housekeeping"](#)

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? PassComment [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? Fail Production areas stabilized ? _____
- 1003c. 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? Fail
- Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

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 large areas on the Northeast and Eastern end of the location that do not appear to be reasonably needed for production operations. Inspections required that these areas need to be reclaimed by 10/30/2018 in accordance to COGCC 1003 reclamation rules and requirements. Various trash debris and equipment stored in these areas have been removed, however, gravel remains and additional reclamation activities have not been conducted. This corrective action remains applicable

Corrective Action

Perform interim reclamation on areas no longer needed for production operations in accordance to COGCC 1000 series reclamation rules and requirements. Designated final land use appears to be rangeland; 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 site. Revegetation activities shall be complete no later than 10/30/2018

Date 11/08/2018Overall 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
				Material Handling And Spill Prevention	Pass	Buckets

Comment: Previous inspections documented numerous 5 gal buckets with chemicals stored at pump jack and the location not in secondary containment, and required the containers be removed or placed in secondary containment in accordance with 1002.f.

Containers/buckets have been removed or placed into secondary containment. This Corrective action has been addressed.

Corrective Action: _____

Date: _____

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
402146516	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910896
696200589	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910886