

**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:

08/20/2019

Submitted Date:

08/21/2019

Document Number:

696200612**FIELD INSPECTION FORM**Loc ID 454166 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10661Name of Operator: BISON OIL & GAS II LLCAddress: 518 17TH STREET #1800City: DENVER State: CO Zip: 80202**Status Summary:**

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

**Findings:**24 Number of Comments7 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
		ops@bisonog.com	
Arthur, Denise		denise.arthur@state.co.us	
		aakers@bisonog.com	
,		dnr_cogccenforcement@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
454166	LOCATION	AC			-	Hunt 8-60 6C	CI

**General Comment:**

On 08/20/2019, Reclamation Specialist Trujillo conducted a follow-up construction and stormwater inspection at Bison Oil and Gas' Hunt 8-60 location in Weld County, Colorado.

This inspection is a follow-up to inspection #682504584 dated 3/8/2019.

This inspection is also a follow-up inspection to FIR Resolution form #402030947 submitted 05/13/2019 by Operator stating corrective actions from inspection #682504584 are complete.

This inspection is also in regards to Sundry doc. #401844836 requesting a 502.b delayed interim reclamation variance for a duration not to exceed five (5) years

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

603.f/1002.f.(2).b: Proper materials management  
603.f: Trash debris  
1002.c: Protection of Soils  
1002.e: Surface disturbance minimization  
1002.f: Install/Repair BMPs at contaminated soil stockpile  
1002.f: Install/Repair BMPs at erosion degradation.

The following corrective actions appear to have been addressed:

603.f: Trash debris removed  
1002.f: Contaminated soils removed

The following compliance issues were observed during this inspection:

210.d: Required signage missing at tanks at battery.  
210.d(2): Labels not posted, or labelling illegible on barrels/containers.  
603.f: Weed establishment on location and around equipment  
603.f: Noxious weed management  
603.f / 1002.f: Proper materials management. Barrels/containers observed on location without secondary containment.  
1002.c: Weed establishment on topsoil pile. Stabilization BMPs  
907.e / 1002.f: Stained soils observed around equipment and barrels outside of containment.  
1002.f: Stormwater degradation on location. Insufficient stormwater and erosion control BMPs; BMPs not been installed in accordance with good engineering practices, and/or maintained in proper functioning condition. Sediment transport off location. Ponding at wells and location with vehicle tracking evident.

Refer to the "Location", "Reclamation", "Stormwater" and "COGCC Comments" sections of this inspection report for additional details.

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.

**Location**Overall Good: ☐**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	It was observed that the required signs or labels (capacity, contents, NFPA, etc...) are not posted on tanks at the battery. See photos 47, 48.		
Corrective Action:	Install signage/labelling to comply with Rule 210.b.	Date:	09/21/2019
Type	CONTAINERS		
Comment:	It was observed that labels were not posted, or labelling illegible on barrels/containers on location; Unable to clearly identify contents. See photos 40, 51		
Corrective Action:	Install required signage/labelling on barrels/containers to comply with Rule 210.b	Date:	09/21/2019

**Emergency Contact Number:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	WEEDS		
Comment:	Weedy vegetative establishment observed on location, around equipment (wells), stormwater BMPs, etc... See photos 37, 38, 40, 45, 46  It was also observed that Field Bindweed ( <i>Convolvulus arvensis</i> ) is establishing on the southern slopes of the pad. This is a Colorado State listed noxious weed. See photo 12		
Corrective Action:	Comply with 603.f	Date:	09/21/2019
Type	OTHER		
Comment:	Stained soils were observed around equipment, and barrels outside of containment. This is a stormwater pollutant source. See photos 49-52		
Corrective Action:	Properly treat or dispose of oily waste in accordance with 907.e.	Date:	09/21/2019
Type	STORAGE OF SUPL		
Comment:	Inspection #682504584 observed containers being stored outside of secondary containment. Inspection required operator to comply with 603.f and 1002.f(2).b and place containers into secondary containment, or remove from location and properly store.  Operator submitted resolution doc. #402030947 stating corrective action complete.  It was observed in this inspection that barrels/containers remain stored on location without secondary containment. Spills from containers evident. See corrective above regarding stained soils. See photos 40, 50-52.  Operator has failed to conduct ongoing and proper materials management. Original corrective action and date remain applicable.		
Corrective Action:	Comply with 603.f and 1002.f(2).b and place materials into secondary containment, or remove and properly store.	Date:	03/26/2019
Type	TRASH		
Comment:	Inspection #682504584 observed trash debris along perimeter of the location.  Operator submitted resolution doc. #402030947 stating corrective action complete.  Trash debris was not observed during this inspection. This corrective action appears to have been addressed.		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS	
Comment:						
Corrective Action:						Date:

**Paint**

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:	<p>Inspection #682504584 observed that containment BMPs storing contaminated soils on the pad were insufficient, and required operator to install or repair BMPs.</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete (soils removed).</p> <p>It was observed in this inspection that the contaminated soils have been removed. This corrective action has been addressed.</p>				
Corrective Action:					Date:

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



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

Comment

Inspection #682504584 documented weed establishment, insufficient BMPs at topsoil and required operator to comply with 1002.c

Operator submitted resolution doc. #402030947 stating corrective action complete.

It was observed in this inspection that erosion degradation has been repaired on the northern side of the soil stockpile, and that stabilization BMPs (mulch) has been installed on the northern side, and the top of the soil stockpiles. Weed establishment was not observed on these areas.

However, it was also observed that weedy vegetation has been allowed to establish on the southern end of the soil stockpile, and no BMPs have been installed in accordance with 1002.c. See photos 5, 6. This corrective action has not been addressed.

Corrective Action

Comply with 1002.c

Date **04/12/2019**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ In Process \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_ In \_\_\_\_\_

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 ? Fail

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? F

Comment This inspection is in response to a 502.b variance request for delayed reclamation. This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the operator guidance document.

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
Mulching	Pass					Cut slopes on west end of location.
Hydro Mulch	Fail					Slope stabilization
Sediment Traps	Fail					
Ditches	Fail					Perimeter ditch
Other	Fail					Slope stabilization
Mulching	Fail					Slope stabilization
				Material Handling And Spill Prevention	Fail	barrels without secondary containment
				Material Handling And Spill Prevention	In Process	Porta-john at risk due to erosion

Comment: Inspection #682504584 observed various stormwater issues and required operator to comply with 1002.f rules.

Operator submitted resolution #402030947 stating CA complete.

It was observed in this inspection that Operator has failed to conduct sufficient and ongoing stormwater management.

SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER

Stormwater and erosion control BMPs are required to be installed in accordance with good engineering practices, and maintained in proper functioning condition at all times in accordance with 1002.f. Due to the significant nature, extent, or duration of this alleged rule violation, this location is being referred to enforcement.

Original corrective action and date remains applicable.

Corrective Action: Comply with COGCC Stormwater Rules: Install or repair required BMPs per Rule 1002.f, and in accordance with good engineering practices.

Date: 04/12/2019

Pits: ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
<p><b>PONDING</b></p> <p>Evidence of stormwater ponding on pad, production areas and wells observed in this inspection. See photos 42-45.</p> <p>There does not appear to be sufficient stormwater controls with a stabilized outlet to mitigate ponding on the location, and to allow for sediment laden free stormwater discharge from the location in accordance with 1002.f and 1002.f.(3). Operator is required to Install stormwater BMPs to 1) mitigate ponding within the pad/production areas, 2) prevent potential industrial pollutant contact and 3) to allow for sediment laden-free stormwater discharge from the location</p>	trujilloam	08/21/2019



<p><b>SLOPES</b></p> <p>Inspection #682504584 observed rill and gully erosion degradation on the slopes of the location, and required Operator to comply with 1002.f</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete.</p> <p>It was observed in this inspection that stormwater erosion remains evident, and has continued to further degrade the location. See photos 11, 14, 16-23, and 27-29.</p> <p>Operator has failed to conduct sufficient and ongoing stormwater monitoring and management in accordance with 1002.f</p>	trujilloam	08/21/2019
<p><b>SEDIMENT TRAPS</b></p> <p>Inspection #682504584 observed that the sediment traps on the perimeter of the location have not been installed in accordance with good engineering practices.</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete.</p> <p>It was observed in this inspection that sediment traps remain improperly constructed in accordance with good engineering practices:</p> <ul style="list-style-type: none"> <li>- The outlet of the sediment trap on the north end of the location has been constructed at the same elevation as the adjacent ditch/berms, and will not allow for stormwater discharge.</li> <li>- Insufficient inlet outlet protection; Inlets/outlets insufficiently armored and are missing protections including, but not limited to, geotextile lining and rip-rap aggregate of appropriate sizes.</li> <li>- Weed establishment occurring at BMPs</li> <li>- Walls/berms at BMP insufficiently compacted/consolidated/stabilized.</li> </ul> <p>See photos 7-9, 30, 31, and 33-36.</p>	trujilloam	08/21/2019
<p><b>DITCH</b></p> <p>Inspection #682504584 observed that the stormwater diversion ditches do not appear to have been constructed in accordance with good engineering practices and have filled with sediment. Inspection required operator to comply with 1002.f</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete</p> <p>It was observed in this inspection that the stormwater diversion ditches remain have not been constructed in accordance with good engineering practices, or maintained in a proper functioning condition:</p> <ul style="list-style-type: none"> <li>-BMP remains insufficiently compacted/consolidated/stabilized.</li> <li>-Stormwater erosion degradation from slopes have filled ditch with sediment, with sediment laden stormwater discharge evident off of location.</li> </ul> <p>See photos 15, 16, 22-24, 30, 32, and 39.</p> <p>Operator has failed to conduct sufficient and ongoing stormwater monitoring and management in accordance with 1002.f</p>	trujilloam	08/21/2019

PORTA-JOHN	trujilloam	08/21/2019
Erosion degradation on slopes is beginning to cut under the porta-john on the east end of the location. Erosion degradation is compromising the stabilization of the porta-john and may result in tipping and spilling contents. See photos 25, 26.		
CULVERTS	trujilloam	08/21/2019
It was observed in this inspection that culverts along access road/location entrance missing sufficient inlet/outlet protection/armoring. See photos		

**Attached Documents**

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

Document Num	Description	URL
402151650	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4915751">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4915751</a>
696200613	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4915750">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4915750</a>