

**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:
09/27/2019
Submitted Date:
09/30/2019
Document Number:
696200805

FIELD INSPECTION FORM

Loc ID: 311709 Inspector Name: Trujillo, Aaron 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: 65550
Name of Operator: OILFIELD SALVAGE & SERVICE CO
Address: 5911 S MIDDLEFIELD RD
City: LITTLETON State: CO Zip: 80123

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
,		oilfieldsalvage@gmail.com	All Inspections
,		dnr_cogccenforcement@state.co.us	

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

General Comment:

On 9/27/2019, Reclamation Specialist Trujillo conducted a follow-up final reclamation and stormwater inspection at Oilfield Salvage's Noonan Ranch #10 location in Adams County, Colorado. 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

It was documented that additional reclamation activities appear to have been conducted, however, stormwater management remains out of compliance with 1002.f rules.

The following alleged compliance issues were observed during this inspection:
1004.a: Grass species observed germinating on location appears to be a single species monoculture not reflective of the adjacent reference area, or reflective of a seed mixture requested by the surface owner.
1002.f: Stormwater and erosion control BMPs have not been installed in accordance with good engineering practices.

Refer to the "Reclamation" and "Stormwater" 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.

Inspected Facilities

Facility ID: 200049 Type: WELL API Number: 001-05051 Status: PA 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 _____

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 **10/04/2019**

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
Waddles	Fail					
Berms	Fail					
Seeding	Fail					
Mulching	Fail					
<p>Comment: SEE COGCC COMMENTS FOR COMMENTS REGARDING STORMWATER</p> <p>Corrective Action: Properly select, install and maintain required site specific stormwater and erosion controls in accordance with 1002.f and good engineering practices. Ongoing stormwater monitoring and management is required until passing final reclamation pursuant to 1004 rules. Date: <u>09/09/2016</u></p> <p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments

Comment	User	Date
<p>RECLAMATION COMMENTS</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.</p> <p>Inspection #682503696 and #696200013 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: Till location, till in straw/hay into contaminated area, apply proper erosion controls Apply "De Salt" on the 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>On July 11th, Mr. Ross Unruh emailed inspector indicating that work would be completed on 7/12/2019.</p> <p>It was observed in this inspection that additional reclamation activities appear to have been conducted, though seeding does not appear to have been done in a proper manner (see stormwater). It was also observed that germination is evident, however, the seed mix used appears to be a single species monoculture (Agropyron Cristatum) not reflective of the adjacent reference area, or reflective of a seed mixture requested by the surface owner in accordance with 1004.a</p> <p>Operator will be required to provide the seed mixture used for the reclamation.</p>	trujilloam	09/30/2019

<p>STORMWATER COMMENTS</p> <p>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.</p> <p>Inspections dated 10/3/2017, 12/18/2017, 8/2/2018 and 5/6/2019 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.</p> <p>It was observed in this inspection that though additional reclamation activities have been conducted, stormwater erosion control BMPs have not been installed in accordance with good engineering practice per 1002.f requirements and corrective actions:</p> <p>1) Wattles have not been properly staked, trenched and backfilled per good engineering practices and remain out of compliance. Operator has been previously notified of these issues and requirements.</p> <p>2) Operator has seeded and crimped mulch up the slope rather than along the contour. Seeding/mulching activities in this manner will not properly stabilize slopes, but rather facilitate stormwater erosion degradation.</p> <p>3) Operator has installed a berm on the south end of the disturbance. Berm remains loose, unconsolidated material and appears to have been "blown-out" in a section. BMP has not been installed in accordance with good engineering practices or maintained in proper functioning condition.</p> <p>Additionally, areas to the west of the fence where sediment deposition due to stormwater runoff from the location does not appear to be stabilized, it is also unclear if reclamation activities were conducted in these areas.</p> <p>This location remains out of compliance with COGCC 1002.f rules. This corrective action has not been addressed and remains applicable.</p>	<p>trujilloam</p>	<p>09/30/2019</p>
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Attached Documents

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

Document Num	Description	URL
696200806	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4950418