

**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: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 65550Name of Operator: OILFIELD SALVAGE & SERVICE COAddress: 5911 S MIDDLEFIELD RDCity: 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 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
,		oilfieldsalvage@gmail.com	<a href="#">All Inspections</a>
,		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.



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

Corrective Action: [Submit the seed mixture used during recent reclamation activities attached to a Form 4 Sundry by 10/4/2019. Provide details as to who provided mixture.](#) 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
Seeding	Fail					
Mulching	Fail					
Berms	Fail					
Waddles	Fail					

Comment: **SEE COGCC COMMENTS FOR 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. Ongoing stormwater monitoring and management is required until passing final reclamation pursuant to 1004 rules.**

Date: 09/09/2016

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

**COGCC Comments**

Comment	User	Date
<p><b>STORMWATER COMMENTS</b></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>	trujilloam	09/30/2019

**RECLAMATION COMMENTS**

trujilloam

09/30/2019

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.

Inspection #682503696 and #696200013 determined that the reclamation failed, that erosion degradation was allowed to continue and no desirable perennial vegetative germination was evident.

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

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.

On July 11th, Mr. Ross Unruh emailed inspector indicating that work would be completed on 7/12/2019.

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

Operator will be required to provide the seed mixture used for the reclamation.

**Attached Documents**

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

Document Num	Description	URL
402192957	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4950421">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4950421</a>
696200806	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4950418">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4950418</a>