

**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:

12/17/2019

Submitted Date:

12/18/2019

Document Number:

697500918**FIELD INSPECTION FORM**Loc ID 318020 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10071Name of Operator: HIGHPOINT OPERATING CORPORATIONAddress: 555 17TH ST STE 3700City: DENVER State: CO Zip: 80202**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**6 Number of Comments1 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	COGCC Enforcement
James, Brian		bjames@hpres.com	
		rwatzman@kpk.com	
KPK		cogcc@kpk.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
318020	LOCATION	AC			-	GREAT WESTERN CUYKENDALL "C" 3	RI

General Comment:

This is an Interim Reclamation and Stormwater inspection at the tank battery.

Highpoint Operating is receiving this Field Inspection Report (FIR) because it is still the Operator of record. Form 10 (Doc.# 402018972) submitted on May 1, 2019 remains in-process. The buying Operator, KP Kauffman, has been included on this FIR.

After an internal review of recent inspections at KPK facilities, COGCC Staff has determined that KPK has repeatedly and consistently failed to comply with certain COGCC rules (categorized in those inspection reports as violations related to "Signs/Marker," "Emergency Contact Number," and/or "Good Housekeeping"). In light of this apparent pattern of violations, violation(s) identified in this inspection report under those categories are being entered for notification and documentation only and are not intended to provide KPK the potential opportunity to resolve the alleged violation(s) without the imposition of penalty, pursuant to Rule 522.c. Therefore, in this inspection report, COGCC Staff has documented violation(s) and identified relevant corrective action(s) required to return to compliance, and pursuant to Rule 522.c., retains discretion to seek penalties for any violation documented in this inspection report.

Inspected Facilities									
Facility ID:	318020	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI

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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? _____ F _____

Comment

Operator has failed to comply with Rule 603.f. to kept the location free of weeds. Refer to the attached inspection photos.

Kochia is a troublesome annual non-native weed that easily breaks off at the stem and becomes a tumbleweed. Operator failed to control and manage weeds to prevent weed waste and prevent the spread of seeds onto adjacent lands.

Corrective Action

Comply with Rule 603.f. This is being referred to Enforcement; therefore, there is no corrective action date.

Date _____

Overall Interim Reclamation Fail

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
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:	At the time of this inspection, no erosion issues were observed at location or along the access road.					
Corrective Action:						Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
COGCC staff, Chris Binschus, did inspect the location twice. The second time Staff met an Operator representative on location to discuss the observed violations. Operator indicated that weed maintenance was scheduled.	binschusc	12/18/2019

Attached Documents

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

Document Num	Description	URL
402266722	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5016699
697500919	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5016698