

**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:

02/10/2020

Submitted Date:

02/12/2020

Document Number:

693901414

FIELD INSPECTION FORM

Loc ID 333708 Inspector Name: ROY, CATHERINE 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: 10000
Name of Operator: BP AMERICA PRODUCTION COMPANY
Address: 1199 MAIN AVENUE SUITE 101
City: DURANGO State: CO Zip: 81301

Findings:

- 6 Number of Comments
- 3 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 |
|--------------|-------|---------------------|---------------------------------|
| , | | SanJuanCOGCC@bp.com | All Inspections |
| Beebe, Sabre | | sabre.beebe@bpx.com | All Inspections |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|
| 260805 | WELL | PR | 12/02/2016 | GW | 067-08511 | STATE CD 2 | RI |
| 295649 | WELL | PR | 08/20/2013 | GW | 067-09542 | STATE CD 4 | RI |

General Comment:

On 2/10/2020 Catherine Roy conducted a reclamation and stormwater inspection. During this inspection the following compliance issues were observed:

- Trailers stored within the northeastern working area need to be removed by 3/15/2020. As this area does not appear needed for production operations, it needs to be reclaimed by 4/15/2020.
- Stormwater erosion needs to be controlled along the northeastern edge of the project area by 2/28/2020.

See below, and attached photos for additional detail.

Inspected Facilities

Facility ID: 260805 Type: WELL API Number: 067-08511 Status: PR Insp. Status: RI

Facility ID: 295649 Type: WELL API Number: 067-09542 Status: PR 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? Fail

Comment Unused trailers stored within the northeastern working area.

Corrective Action Remove and properly store unused trailers.

Date 03/15/2020

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? _____
 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 Areas on the graveled well pad where unused trailers are parked, do not appear needed for production operations and remain unreclaimed.

Corrective Action Reclamation needs to be conducted in areas not needed for production operations in accordance with 1003 reclamation rules.

Date 04/15/2020

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 | Multi-Well Location |
|---------------------------|---------------------------------|---------------------|

Storm Water:

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

Comment: Stormwater erosion is occurring along the northeastern edge of the project area where wattle is failed and snow melt flows off of the project area. Wattle is not a sufficient BMP for this area.

Corrective Action: Stormwater controls need to be installed to stabilize erosion along the northeastern edge of the project area. Stormwater controls need to be selected, sized, installed, and maintained using good engineering practices such as those described by CDOT in their erosion control manuals.

Date: 02/28/2020

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 |
|--------------|-------------------|---|
| 693901416 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5065750 |