

**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:

03/24/2020

Submitted Date:

03/30/2020

Document Number:

693901570

FIELD INSPECTION FORM

Loc ID 325952	Inspector Name: ROY, CATHERINE	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED
Operator Information: OGCC Operator Number: 10133 Name of Operator: HILCORP ENERGY COMPANY Address: P O BOX 61229 City: HOUSTON State: TX Zip: 77208				Findings: 5 Number of Comments 2 Number of Corrective Actions <input checked="" type="checkbox"/> 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
Shorty, Priscilla		pshorty@hilcorp.com	All SW Inspections
Ray, Mandy	(505) 599-4083	mray@hilcorp.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
215627	WELL	PA	01/23/2015	GW	067-07232	ALLISON UNIT 136	RI

General Comment:

On 3/24/2020 Catherine Roy conducted a reclamation and stormwater inspection. Document 400791120 describes plugging the well on 1/23/2015. During this inspection the following compliance issues were observed:

- Equipment needs to be removed.
- Weeds need to be controlled.
- Revegetation needs to be conducted in areas with poor vegetative cover.
- Revegetation and weeds need to be monitored and managed by a qualified vegetation specialist, until passing final reclamation. Documentation of monitoring/management may be requested as part of this corrective action.
- Stormwater erosion needs to be controlled.

Operator is directed to perform corrective actions outlined on this inspection report immediately. Doing so may decrease the duration of alleged violations and the penalties that may be assessed pursuant to Rule 523. Corrective action dates are not assigned as it is the expectation that the location be at or near completed final reclamation when inspection is conducted in response to Form 4 request for final reclamation.

This final reclamation inspection was conducted in response to the operator submitting official documents to imply or directly state that final reclamation is complete per a final reclamation inspection request and/or a bond release request. Upon inspection, it is evident that significant elements of final reclamation are not complete. Per COGCC rules, submission of falsified documentation can be considered an aggravating factor if, or when, enforcement actions are recommended.

See below, and attached photos for additional detail.

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 REVEGETATIONCropland

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 **Fail** Locations, facilities, roads, recontoured **In**

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% 1

TRANSECT RESULTS OF REFERENCE AREA% 42

TOTAL % OF DESIRABLE VEGETATION COVER 2

VEGETATIVE COVER FAIL

Comment:

Corrective Action:	Significant portions of the well pad are not revegetating. After review of aerial imagery, it appears that many of these areas are where project facilities were located, indicating likely soil contamination and/or soil compaction. Two, 100-foot vegetation transects were conducted on the well pad, documenting a lack of uniform revegetation and presence of jointed goatgrass, a state and La Plata County-listed noxious weed. Vegetative cover in Transect 1 was 2% of the reference area, and vegetative cover in Transect 2 was 36% of the reference area. Equipment remains in the southwestern project area and needs removal.	Date _____
	<p>-Control weeds. Note that integrated weed management methods are likely needed for jointed goatgrass control and are primarily focused on preventing seed dispersal in spring.</p> <p>-Revegetation needs to be conducted in portions of the well pad with little to no vegetative cover. Revegetation needs to be monitored by qualified personnel, knowledgeable of revegetation and weeds, and managed as needed to ensure that revegetation is increasing. Documentation of monitoring may be requested.</p> <p>-Unused equipment needs to be removed</p>	

Overall Final Reclamation

Fail

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: Erosional channels approximately 1 foot wide and 10 inches deep are forming within the southwestern project area.

Corrective Action: Stormwater controls need to be installed to stabilize erosion within the project area.

Date: _____

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
402357068	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110407
693901572	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110395
693901574	Transect Datasheet	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110396