

**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:

05/28/2020

Submitted Date:

06/01/2020

Document Number:

692402225**FIELD INSPECTION FORM**Loc ID 314168 Inspector Name: Colby, Lou On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 100321Name of Operator: ROCKY MTN NATURAL GAS LLC ADBA BLACK HILLSAddress: 1515 ARAPAHOE ST TOWER 1City: DENVER State: CO Zip: 80202**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**12 Number of Comments8 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
Gross, Jason	970-876-9046	jason.gross@usda.gov	Surface
		jessicadonahue@summiteng.net	
Warnes, Thomas	970-406-1476	thomas.warnes@blackhillscorp.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465889	WELL	DG	07/23/2019		097-06016	Wolf Creek 9-D2	RI
465890	WELL	DG	07/23/2019		097-06017	Wolf Creek 9-D3	RI

General Comment:

This is an Interim Reclamation & Stormwater focused Inspection. Any Corrective Actions from previous Inspections that have not been addressed are still applicable.

This site, located in the White River National Forest in Pitkin County, was minimally expanded in 2019 to facilitate Drilling of two Storage Wells in the Wolf Creek Storage field. The existing Well on site was Plugged and Abandoned in 2018.

It is apparent there is more work to be completed at this site and that Winter conditions at this elevation (over 10,000ft) dictated delaying activities until 2020; however site was not cleaned up or properly stabilized for Winter as evidenced by CAs in this Inspection.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Various trash scattered over Location. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	STORAGE OF SUPL		
Comment:	Various Equipment not stored in a workman like manner. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f.	Date:	06/15/2020
Type	OTHER		
Comment:	Non reportable spills - stained soil/gravel in multiple areas of location. Refer to Photo Log attached.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a. Properly treat or dispose of oily waste in accordance with 907.e	Date:	07/01/2020
Type	UNUSED EQUIPMENT		
Comment:	Various unused equipment scattered over Location. Also noting here, ends of rebar protruding from pad surface at East side of site posing a Safety hazard. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	DEBRIS		
Comment:	Various Debris scattered over Location. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	DEBRIS		
Comment:	There are slash/debris piles and down timber around perimeter of location. Operator should consult with Forest Service about mangement of this Debris.		
Corrective Action:		Date:	

Overall Good: ☐

Spills:				
Type	Area	Volume		
Other				
Comment:	Cellars are over flowing with stormwater(oily sheen noted) creating potential for contamination of stormwater with Cellar/ wellhead pollutants. Refer to Photo Log attached.			
Corrective Action:	Properly treat or dispose of oily waste in accordance with 907.e.			Date: 06/15/2020

In Containment: No

Comment: ☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Other	#		
Comment:	Open cellars of two Wells with no covers or fencing. Cellars measured at 4 feet deep. Refer to Photo Log attached.		

Corrective Action:	Install cellar cover to maximize safety and wildlife welfare. If holes remain that would allow wildlife ingress, install means of Wildlife egress, or fill in cellar if practical.	Date:	06/15/2020
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Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 314168 CDP: _____

Comment: _____

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: _____

Corrective Action: _____ Date: _____

On Site Inspection (305):Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

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Summary of Operator Response to Landowner Issues:

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Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

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Inspected Facilities				
Facility ID: <u>465889</u>	Type: <u>WELL</u>	API Number: <u>097-06016</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465890</u>	Type: <u>WELL</u>	API Number: <u>097-06017</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: 2A states that size of Disturbed area during construction expansion will be .76 Acres and that size of Location after Interim Reclamation will be .76 acres. it appears from aerial measurements on Google Earth that disturbance size is closer to 1.5 Acres..

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: RANGELAND

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
<p>Comment: Most BMPs have failed and do not appear adequate for the project area or initially installed properly. There is sloughing and cracking where access road enters location and lack of BMPs installed along access road. Sediment migration is occurring, slopes do not appear stable. Generally, it appears site was not adequately stabilized or prepared for wintering in these extreme conditions, over 10,000 feet in elevation. Refer to Photo Log attached.</p>						
<p>Corrective Action: Install or repair sufficient / effective BMPs in accordance with, and monitoring per Good Engineering Practices per Rule 1002.f.</p>						<p>Date: 07/01/2020</p>
<p>Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

Attached Documents

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

Document Num	Description	URL
692402226	Inspection Photos RI	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5163992