

**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:

05/26/2020

Submitted Date:

05/27/2020

Document Number:

696201320

FIELD INSPECTION FORM

Loc ID 418697 Inspector Name: Trujillo, Aaron 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: 77330
Name of Operator: SG INTERESTS I LTD
Address: 100 WAUGH DR SUITE 400
City: HOUSTON State: TX Zip: 77007

Findings:

- 10 Number of Comments
- 1 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
Arthur, Denise		denise.arthur@state.co.us	
,		inspection@sginterests.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
418693	WELL	PA	07/11/2019	GW	051-06098	VOLK 12-89-21 #1	RI
418697	LOCATION	CL			-	VOLK 12-89-21 #1	RI

General Comment:

On 5/26/2020, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at SG Interests' Volk 12-89-21 #1 location in Gunnison County, Colorado.

This inspection is also in response to a 1001.c, 502.b reclamation variance request. Operator submitted doc. #402118574 on 7/23/2019 requesting the following:

- 1) A waiver to reclaim the access road in accordance with 1004 Rules
- 2) A waiver to reclaim the pad in accordance with 1004 Rules

Per the SOVR, of the 3.75 acres disturbed 2.15 acres is to be stabilized and left for the surface owner; Surface Owner requested the eastern 75' to remain graveled for use as a parking area for events and equipment storage, and the remaining areas of the pad for cropland.

This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the "1001.c: Reclamation Variances and Waivers" operator guidance document. Please refer to the guidance document for additional details.

Please note that the submission of a variance request does not guarantee approval. The COGCC will provide notice to Operator once an official decision has been made.

All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation; any corrective action(s) from previous inspections that have not been addressed will remain applicable.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

Inspected Facilities

Facility ID: 418693 Type: WELL API Number: 051-06098 Status: PA Insp. Status: RI

Facility ID: 418697 Type: LOCATION API Number: - Status: CL Insp. Status: RI

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: HAY MEADOW, IMPROVED PASTURE, IRRIGATED, RANGELAND

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: HAY MEADOW, IMPROVED PASTURE, IRRIGATED, RANGELAND _____

Reminder: _____

Comment:

Well plugged Pass 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
		Culverts	Pass			
Ditches	Fail					
		Gravel	Pass			Road and eastern location
Other	Fail					BMPs on northern slopes
Waddles	Fail					
Comment: See "COGCC COMMENTS" for comments regarding stormwater						
Corrective Action: Install or repair required BMPs in accordance with good engineering practices per Rule 1002.f.(2)C. Conduct revegetation/reseeding activities on the slopes and install erosion controls to stabilize the seeded soil.						Date: <u>06/11/2020</u>
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Insufficient or missing stormwater and erosion control BMPs on the Location in accordance with Rule 1002.f.(2)C:</p> <p>Erosion degradation observed on areas where topsoil was stockpiled on the northwest end of the Location and the cut slopes. Seeps evident on the cut slopes with water actively discharging into the north perimeter stormwater diversion ditch; areas of the cut slope are sloughing and a headcut has formed. BMPs missing or insufficient; Slopes requiring stabilization.</p> <p>Stormwater diversion ditch on the north and west perimeter of the pad ends at the top of the fill slope on the southwest end of Location; erosion degradation due runoff from the ditch with sediment discharge off-location into an adjacent irrigation ditch observed; Insufficient BMPs installed to protect southwest fill slopes. Stormwater ditch BMPs on the perimeter of the pad, and the western areas of the Location have not been constructed in accordance with good engineering practices, including a sufficient outlet to allow for sediment laden-free stormwater discharge.</p> <p>Additional ditches have been constructed on the western ends of the Location; Ditches appear to have been constructed with a blade; BMPs have not been constructed in accordance with good engineering practices and are missing sufficient outlets to allow for sediment laden-free stormwater discharge.</p>	trujilloam	05/27/2020
<p>Per the "Rule 1001.c. Surface Owner Waiver for Final Reclamation" COGCC Operator Guidance document, Stormwater Rules 1002.f.(1)(2)(3), and weed management rules can not be waived; Continue conducting stormwater and weed management until Location has received a passing final inspection.</p>	trujilloam	05/27/2020

<p>RECLAMATION COMMENTS</p> <p>It was observed in this inspection that work on the Location has been conducted per the 502.b SOVR, not in accordance with 1004 Rules; Rock/gravel has been removed and placed onto the eastern ~75' of the Location; Eastern portion of pad appears stabilized. Topsoil appears to have been placed onto the remaining western areas, which will be returned to cropland; Vegetation observed on pad predominantly weedy plant species. A high-fence has been installed around the perimeter of the pad, which has been left flat.</p> <p>Topsoil has been replaced on areas west of the pad and contoured; It is unclear if these areas have been seeded- reclamation plan included in the SOVR states areas will be seeded. Areas of the cut/fill slope do not appear to be sufficiently stabilized and will require additional seeding activities; See "stormwater" comments within the "COGCC Comments" below.</p>	<p>trujilloam</p>	<p>05/27/2020</p>
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Attached Documents

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

Document Num	Description	URL
402407020	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5160088
696201321	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5160084