

**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:

07/16/2020

Submitted Date:

07/22/2020

Document Number:

693902046

FIELD INSPECTION FORM

Loc ID 334299 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: 10453
Name of Operator: PARADOX UPSTREAM LLC
Address: 500 DALLAS ST SUITE #1650
City: HOUSTON State: TX Zip: 77002

Findings:

- 4 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
Miller, Mandy	970-739-3786	mandym@paradoxresources.com	
Nowak, Scott		scottn@bogresources.com	All Inspections
Hankins, Neil	970-428-2742	davidh@paradoxresources.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
266681	WELL	TA	03/01/2020	GW	113-06123	HAMILTON CREEK STATE 36-41	RI
282322	WELL	PR	09/01/2017	GW	113-06203	HC STATE 36-31-45-15	RI
282323	WELL	SI	02/01/2020	GW	113-06204	HC STATE 36-42-45-15	RI

General Comment:

On 7/16/2020 Catherine Roy conducted a reclamation and stormwater inspection. During this inspection the following compliance issues were observed:

-Diffuse knapweed infestation is not being controlled. Approximately 1000 individuals observed. Corrective action to treat the knapweed and provide a treatment plan from 2018 reclamation inspection is not addressed. Diffuse knapweed is a San Miguel County Priority Species for eradication, as well as a State-listed noxious weed species. Corrective action date is back-dated to 2018 to document duration of non-compliance (8/31/2018). It is the expectation that the infestation be immediately addressed and a weed control plan provided (as described below).

See below, and attached photos for additional detail.

Inspected Facilities

Facility ID: 266681 Type: WELL API Number: 113-06123 Status: TA Insp. Status: RI

Facility ID: 282322 Type: WELL API Number: 113-06203 Status: PR Insp. Status: RI

Facility ID: 282323 Type: WELL API Number: 113-06204 Status: SI 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? _____

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 -Diffuse knapweed infestation is not being controlled. Approximately 1000 individuals observed. Corrective actions to treat the knapweed and provide a treatment plan are not addressed. Diffuse knapweed is a San Miguel County Priority species for eradication, as well as a State-listed noxious weed species.

Corrective Action -Submit as an attachment to a Form 4, a weed control plan to control the diffuse knapweed population within the project area. The plan should include:

- Documentation of 2020 treatment report
- All measures necessary to control infestation (multiple treatment methods may be needed)
- Schedule of treatments (multiple treatments will likely be needed/year)
- Map showing infestation area
- Description of application methods

Recommend meeting with county weed/extension specialist to advise on an effective plan.

Corrective action date is back-dated to 2018 corrective action date to document duration of non-compliance. It is the expectation that the infestation be immediately addressed and the request for a weed control plan provided.

Date 08/31/2018

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:

Corrective Action:

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
402449502	INSPECTION SUBMITTED	402449502.pdf
402451144	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5205955
693902047	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5205329