

**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:

07/24/2020

Submitted Date:

07/27/2020

Document Number:

697501785**FIELD INSPECTION FORM**Loc ID 327954 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 100322Name of Operator: NOBLE ENERGY INCAddress: 1001 NOBLE ENERGY WAYCity: HOUSTON State: TX Zip: 77070**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:5 Number of Comments1 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
,		NBL_DJBU_Inspections@NB LENERGY.COM	All Inspections
Adamczyk, Megan		megan.adamczyk@state.co.u s	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
327954	LOCATION	CL			-	MYERS-65N65W 14NENW	RI

General Comment:

This inspection is in response to a complaint regarding reclamation- see the complaint and final reclamation sections for more detail.

Note: This is the second complaint submitted regarding reclamation. The first complaint submitted was 02/2019 (Complaint #: 200446939).

Inspected FacilitiesFacility ID: 327954 Type: LOCATION API Number: - Status: CL Insp. Status: RI**Complaint**

Comment: Complaint #: 200449098
Field Inspector Assigned: Chris Binschus
Location ID #: 327954
Inspection Document #: 697501785
Nature of complaint: An inspection of the above location was conducted with focus on final reclamation. Complainant believes poor quality soil was used to address subsidence. Refer to the final reclamation section for more detail.

Corrective Action:

Date:

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 _____ 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:

In response to the previous complaint, Operator excavated soil within the production area and exported the removed subsoil due to concerns about road base left behind. Operator then imported clean fill material to replace the removed subsoil and spread new topsoil that was equivalent in soil chemical and physical properties of reference soils.

At a later date, Operator had to address subsidence by added soil material, tilled the added soil material, and recontoured the area. Complainant believes poor quality soil was used to address subsidence.

Based on field observations, the added soil material appears to have a high silt content which does not appear to be consistent with reference soils. Refer to the attached inspection photos.

Corrective Action:

Per Rule 1004, the same standards as established for interim reclamation under Rule 1003 shall be performed. As to cropland per Rule 1003.b., if subsidence occurs in such areas additional topsoil shall be added to the depression.

Per Rule 1004, Operator shall perform soil testing to confirm the added soil material to address subsidence is equivalent to reference soils and will meet the growth requirements for alfalfa. Operator shall coordinate to perform soil testing in the presence of COGCC staff and the complainant. Refer to the COGCC Comments sections for soil sampling requirements.

There is no corrective action date because this might be referred to Enforcement.

Date _____

Overall Final Reclamation

FailWell Release on Active Location ☐Multi-Well Location ☐**COGCC Comments**

Comment	User	Date
Operator shall report the following soil chemical and physical properties from each sample: depth of sample, percent texture estimates, organic matter (%), pH (1:1), soluble salts (mmohs/cm, 1:1), N (ppm, FIA), P (ppm, Bicarbonate), K (ppm, exc. NH ₄ OAc), CEC, and SAR.	binschusc	07/27/2020
Note 1: the above soil sampling was previously performed to confirm new topsoil being imported was equivalent to reference soils.		
Note 2: To ensure consistency, Operator shall have the same contractor, Ag Professionals, conduct the required soil sampling.		
Note 3: Operator shall submit the required soil sample results via Form 4 Sundry Notice.		
Note 4: Once COGCC staff reviews the soil sample results, Staff will make the determination on whether or not the Operator needs to excavate the added soil used to address subsidence, and import new topsoil that is equivalent to reference soils, which meets the growth requirements for alfalfa.		

Attached Documents

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

Document Num	Description	URL
402453223	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5210930
697501787	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5210929