

**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:

08/10/2020

Submitted Date:

08/11/2020

Document Number:

696201631**FIELD INSPECTION FORM**Loc ID 335667 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10456Name of Operator: CAERUS PICEANCE LLCAddress: 1001 17TH STREET #1600City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:8 Number of Comments5 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
,		COGCC.inspections@caerus oilandgas.com	All Inspections
Arauza, Steven		steven.arauza@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335667	LOCATION	AC			-	N PARACHUTE WF15A-23 F23596	RI
470366	SPILL OR RELEASE	CL	07/22/2020		-	F23-596 Dumpline Release	RI

General Comment:

On 8/10/2020, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Caerus' N Parachute WF15a-23F23596 location in Garfield County, Colorado.

This inspection is also a follow up to inspection #696201519, to document compliance with the following corrective actions:

- 1) Within a FIRR, identify observed equipment and its current application for production activities on the Location by 7/23/2020
- 2) Remove and replace excavated soils by 7/30/2020
- 3) Contact Environmental regarding a sampling plan no later than 7/30/2020
- 4) Install or repair required BMPs per Rule 1002.f by 7/14/2020

It was observed that the excavated soils have been removed from the edge of the pad and interim areas, and replaced on the north end of the pad. No resolution form with the required information has been provided. BMPs remain missing or insufficient. Refer to the photo-documentation of the observed compliance issues attached to this report.

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

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

			corrective date
Type:	# 2		
Comment:	<p>Inspection #696201519 documented a riser and what appears to be process piping on the west end of the Location. Inspection stated that it is unclear as to what the current application of the equipment is, therefore Operator was required to, within a resolution form, identify what the observed equipment is for and its current application for production activities on the Location by 7/23/2020.</p> <p>No resolution form has been submitted identifying equipment and current application for production activities on the Location. This corrective action and date remains applicable.</p>		
Corrective Action:	Within a resolution form, identify what the observed equipment is for and its current application, for production activities on the Location.		Date: 07/23/2020

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	335667	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	470366	Type:	SPILL OR	API Number:	-	Status:	CL	Insp. Status:	RI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
	Piles	Inadequate		
Comment	<p>Inspection #696201519 required Operator to submit a reclamation plan to address areas impacted by excavated soils by 8/16/2020.</p> <p>At time of writing inspection, no plan has been submitted, corrective action remains applicable.</p>			
Corrective Action	<p>Submit a recalamtion plan to address reclamation of the interim areas disturbed, and possibly impacted, during spill response efforts. At a minimum the plan shall include:</p> <ol style="list-style-type: none"> 1) Detailed schedule for reclamation activities 2) Methods and depth for decompaction 3) Seed mix, and application rates (in PLS/square foot), and application methods 4) Mulch type, application rates and application methods 5) Fertilizer/soil amendments <p>Attach plan to a Form 4 Sundry and submit to Reclamation Specialist Trujillo and West Environmental Protection Specialist Arauza.</p>			Date: <u>08/16/2020</u>
	Piles	Inadequate		
Comment	<p>Continued from above compliance issue: Due to the potential impacts to the soils beneath where the excavated soils are currently stored and the area of the dumphine spill spill, Operator will be required to submit a plan to address final reclamation and potential remediation of the Location.</p> <p>Once information has been analyzed and gathered, based on soil contamination as submitted to environmental, then a final reclamation plan will be required as detailed on the Form 27, as a COA</p>			
Corrective Action				Date:
	Piles	Inadequate		
Comment	<p>Due to the potential impacts to the topsoil/soil surface beneath the excavated soil stockpiles, Inspection #696201519 required Operator to collect soil samples from below the excavated soil stockpile areas once they have been removed, and from an appropriate adjacent reference area for comparative analysis of pH, EC and SAR. Operator was required to contact Environmental regarding a sampling plan for the excavated materials no later than 7/30/2020</p> <p>No form 4 sundry with a comparative soils analysis has been submitted. Per West EPS S. Arauza, Operator has not contacted environmental regarding a sampling plan for the excavated materials.</p> <p>Corrective actions have not been addressed and remain applicable.</p>			
Corrective Action	<p>Collect a minimum of 3 soils samples from below the excavated soil stockpile areas once they have been removed, and a minimum of 3 soil samples from an appropriate adjacent reference area for comparative laboratory analysis of pH, EC and SAR. Attach the soil sample analysis and map of sample locations/depth/etc.. to a Form 4 Sundry and submit to Reclamation Specialist Trujillo and West Environmental Protection Specialist Arauza.</p> <p>Contact Environmental regarding a sampling plan for the excavated materials as soon as possible, no later than 7/30/2020.</p>			Date: <u>07/30/2020</u>
	Piles	Inadequate		

Comment	<p>Inspection #696201519 required Operator to remove the excavated soils from the interim areas and pad perimeter and store in a more manageable area of the Location for remediation work and to implement BMPs to mitigate transport/discharge of impacted materials pursuant to 1002.f rules.</p> <p>It was observed that Operator removed and placed excavated soils from the northwest corner of the pad, onto the northern perimeter of the pad approximately 80 feet east. It was observed that no BMPs to mitigate transport/discharge of impacted materials have been installed pursuant to 1002.f rules.</p> <p>Corrective action has not been addressed in its entirety and remains applicable.</p>	
Corrective Action	Implement BMPs to mitigate transport/discharge of impacted materials pursuant to 1002.f rules.	Date: 07/30/2020

Spill/Remediation:

Comment:		
Corrective Action:		Date: _____

Emission Control Burner (ECB):	_____	
Comment:		
Pilot:	_____	Wildlife Protection Devices (fired vessels): _____

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

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Inspection #696201519 observed that BMPs are missing or insufficient to prevent off-site sediment transport from the potentially impacted stockpiled soils on the north end of the Location. Inspection required Operator to Install or repair required BMPs per Rule 1002.f by 7/14/2020.

It was observed in this inspection that BMPs remain missing or insufficient; Wattles have been installed within the northwestern interim areas, BMP has not been installed in accordance with good engineering practices; BMP has been installed on top of rocks/objects creating gaps beneath wattles, wattles observed with gaps between wattle ends; BMP has not been properly trenched/backfilled.

Corrective action remains applicable.

Corrective Action: Install or repair required BMPs per Rule 1002.f. Continue stormwater management and implement BMPs as needed to adapt to the site conditions.

Date: 07/14/2020

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
402464336	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5221390
696201632	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5221381