

**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:

09/18/2020

Submitted Date:

10/01/2020

Document Number:

697502026

FIELD INSPECTION FORMLoc ID 336346 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**

OGCC Operator Number: 47120

Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP

Address: P O BOX 173779

City: DENVER State: CO Zip: 80217-

Status Summary:

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

Findings:

8 Number of Comments

2 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
		poolsteven@hrodlaw.com	
		Kate_Graves@oxy.com	
Pesicka, Conor		conor.pesicka@state.co.us	
,		COGCCinspections@anadarko.com	All inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
336346	LOCATION	AC			-	DOUTHIT-63N68W 26NENE	RI

General Comment:

This is a follow up desktop inspection in response to a reclamation complaint. COGCC staff submitted a corrective action inspection on 9/23/2020 (Field Inspection Report (FIR) Doc. #697502015). In response to the FIR, the complainant had concerns about COGCC's assessment on access roads. After COGCC staff conducting further review, COGCC made changes to the reclamation requirements for access roads- Refer to Photo #1 and COGCC Comments for additional information.

This inspection is being entered for notification and documentation only and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

corrective date

Type:

#

Comment:

There was an observed off-location out of service flowline riser related to a domestic tap which has not been abandoned per Rule 1105. Refer to Photo 12.

As an update on 10/1/2020, Oxy has contacted COGCC staff and are working towards getting it resolved and completing the abandonment of the riser.

Corrective Action:

Comply with Rule 1105. This might be referred to Enforcement; therefore, there is no corrective action date. Operator should conduct the corrective action as soon as possible.

Date:

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities			
Facility ID: 336346	Type: LOCATION	API Number: -	Status: AC
		Insp. Status: RI	
Complaint			
Comment:	Complaint #: 200449186 Field Inspector Assigned: Chris Binschus Location ID#: 336346 Inspection Document #'s: 697502015 and 697502026 Nature of complaint: Complainant had concerns about crop growth, access roads, damaged irrigation ditch, and an off-location flowline.		
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 _____

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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage **Fail**

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:	<p>This location does not comply with Rule 1004. The southern location mostly lacks crop growth and the crops that are growing are stunted. Refer to Photos 5-10. Complainant also indicated the adjacent corn field to the north had crop deficiencies; however, corn had already been harvested at the time of this inspection.</p> <p>It appears the Operator has damaged a section of irrigation ditch from plugging operations and has failed to repair it. Refer to Photo 11.</p> <p>Operator has failed to reclaim a portion of an access road that was not pre-existing and has failed to remove gravel from a portion of a pre-existing road. Refer to Photo 1 and COGCC Comments for additional information.</p>	Date _____
	<p>Comply with Rule 1004 to perform additional reclamation activities related to failed crop growth, reclaim portions of the access road that were not pre-existing and remove gravel from portions of the access road that were pre-existing, and repair the irrigation ditch.</p> <p>This might be referred to Enforcement; therefore, there is no corrective action date. Operator should conduct the corrective action as soon as possible. Collaborate with the landowner to determine mitigating measures that will allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production.</p>	
Overall Final Reclamation Fail Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: At the time of this inspection, no erosion issues were observed.						
Corrective Action: _____						Date: _____
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments

Comment	User	Date
Note: The attached photo document also has other locations related to Complaint #200449186.	binschusc	10/01/2020
Note: COGCC staff now changed the reclamation requirements to include the removal of gravel from pre-existing roads that were built prior to the commencement of oil and gas activity. It is believed these access roads built prior to oil and gas activity did not have gravel and that gravel was imported to improve access and oil and gas operations. Per Reclamation Rules, the surface of the land shall be restored as nearly as practicable to its condition at the commencement of drilling operations.	binschusc	10/01/2020
Also, COGCC staff removed the orange circle from Photo #1 for Location #4 because technically there were no observed reclamation issues and there were no corrective actions assigned to that location.		

Attached Documents

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

Document Num	Description	URL
402502062	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5261013
697502030	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5261008