

Inspection Photos

9/03/2021

Operator: CAERUS ENERGY SERVICES LLC -
10668

Location ID: 479149
Garfield County, CO

Aaron Trujillo
NW Reclamation Specialist
COGCC

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Photo 1: Photo taken from the Location entrance. Photo shows sign at Location entrance remains missing.



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Photo 2: Photos taken from the south end of the Location, facing northwest/northeast. Photos provide overview of the Location; construction operations completed.

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Photo 3: Photos taken from the stockpiled soils on the south end of the Location. Photo shows an example of where erosion logs (wattles) throughout the Location were observed to have not been installed in accordance with good engineering practices, or maintained in proper functioning condition. Photo also shows BMPs to protect and stabilize the stockpiled soils is missing or insufficient.

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Photo 4: Photos provide an example where perimeter stormwater and erosion control measures are missing or insufficient. Photos also provide example showing BMPs to protect and stabilize the stockpiled soils, and to prevent mixing with other horizons (such as the fill slope material), are missing or insufficient.

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Photo 5: Photos provide an example showing BMPs to protect and stabilize the stockpiled soils and fill slopes, and to prevent mixing with other horizons (such as the fill slope material), are missing or insufficient. Operator appears to have excavated and placed topsoil material on top of the fill slopes.

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Photo 6: Photos taken from the northwestern areas of the Location. Photos provide an example where Operator appears to be in the process of implementing the topsoil stockpiles along the perimeter of the Location as a part of their perimeter stormwater BMPs; Operator has been previously notified verbally, and in other FIRs that the utilization of topsoil as stormwater control measures does not comport with Rule 1002.b and 1002.c, as the use of topsoil as a stormwater BMP puts the resource at risk of compaction, contamination due to mixing with sediment/subsoil, and places the resource at risk for loss due to stormwater discharge displacing the topsoil; perimeter stormwater and erosion control BMPs currently missing or insufficient to properly manage runoff from the large disturbance area. Photos also provide example showing BMPs to protect and stabilize the stockpiled soils, and to prevent mixing with other horizons (such as the fill slope material), are missing of insufficient.

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Photo 7: See comments under photo 6

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Photo 8: Photos taken from the north end of the Location, facing east/south. Photos provide example of areas where perimeter stormwater and erosion control BMPs are missing or insufficient. Photos also examples showing that BMPs to protect, stabilize and prevent sediment transport from the salvaged soils are missing or insufficient.

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Photo 9: Photos show example of slopes on the Location; BMPs to protect and stabilize the (fill) slopes of the Location remain missing or insufficient/inadequate.

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Photo 10: Photos taken from the eastern areas of the Location. Photos provide an example where Operator appears to be in the process of implementing the topsoil stockpiles along the perimeter of the Location, as a part of their perimeter stormwater BMPs; Operator has been previously notified verbally, and in other FIRs that the utilization of topsoil as stormwater control measures does not comport with Rule 1002.b and 1002.c, as the use of topsoil as a stormwater BMP puts the resource at risk of compaction, contamination due to mixing with sediment/subsoil, and places the resource at risk for loss due to stormwater discharge displacing the topsoil; perimeter stormwater and erosion control BMPs currently missing or insufficient to properly manage runoff from the large disturbance area. Photos also provide example showing BMPs to protect and stabilize the stockpiled soils, and to prevent mixing with other horizons (such as the fill slope material), are missing or insufficient.

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Photo 11: Photos taken from the west end of the Location. Photos provide an example showing that perimeter stormwater and erosion control BMPs that allow for sediment laden-free stormwater discharge is missing or insufficient measures are missing or insufficient. Photos also provide example showing BMPs to protect and stabilize the stockpiled soils are missing or insufficient.

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September 3, 2021
39.67823452N 108.1379492W

Photo 12: Photo taken from the topsoil stockpile on the north end of the Location. Photo shows example of areas where Operator has implemented a wattle ~100+ feet away from the disturbance area. Perimeter control measures inadequate.



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Photo 13: Photos taken from the east end of the Location. Photos provide example where proper soil segregation is inadequate. Photos also provide example showing BMPs to stabilize soils are missing or insufficient. See comments under photo 10 regarding use of topsoil as a stormwater and erosion control BMP.

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Photo 14: Photo taken from the fill slopes. Photo shows soils exposed by the Reclamation Specialist beneath the fill material; salvage of all the topsoil on the Location's disturbance appears inadequate; Reclamation Specialist observed soils beneath fill material containing organic matter typical of topsoil horizons; Operator does not appear to have salvaged and segregated all of the topsoil from the disturbed areas during construction activities.



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Photo 15: Continued from photo 14. Photo shows soils observed beneath the fill material; soils contain organic material typically observed within the topsoil horizons (including roots, and other vegetative/organic matter); woody/shrub and other plant matter can be observed sticking through the fill material throughout Location. Operator does not appear to have salvaged and segregated all of the topsoil from the disturbed areas during construction activities.