

**FORM  
INSP**Rev  
X/20**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:

09/03/2021

Submitted Date:

09/08/2021

Document Number:

696203134

**FIELD INSPECTION FORM**Loc ID 479149 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

City: 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 Comments

5 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
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479149	LOCATION	AC			-	BJU B26-496 Pad	CI

**General Comment:**

On 9/3/2021, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction inspection at Caerus Piceance LLC's BJ B26-496 Pad location in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

605.a: O&G Location Signage  
1002.b: Soil removal and segregation  
1002.f: Stormwater

Refer to the "Construction" section of this inspection report for additional details.

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

**Location Construction**

Location ID: 479149 CDP: \_\_\_\_\_

Comment: Pursuant to Rule 605.a, signage is required at the entrance to the Location from the time of construction. Inspection #696203027 observed that signage was missing at the Location, and required Operator to comply with Rule 605.a by 9/11/2021. Signage remains missing at Location entrance; corrective action remains applicable.

Corrective Action: **Comply with Rule 605.a**Date: **09/11/2021****Form 2A COAs:**

Comment: \_\_\_\_\_

Corrective Action: <input style="width: 95%;" type="text"/>	Date: <input style="width: 95%;" type="text"/>
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**Wildlife BMPs:**

Comment: <input style="width: 95%;" type="text"/> Corrective Action: <input style="width: 95%;" type="text"/>	Date: <input style="width: 95%;" type="text"/>
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**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
WADDLES	Yes		No

Comments: Erosion BMPs: See "Comment #1" under "COGCC Comments" at end of this report.

Other BMPs:

Corrective Action: Comply with Rule 1002.f and implement perimeter stormwater and erosion control BMPs to manage runoff, and to allow for sediment laden-free discharge from the Location; ensure BMPs are installed accordance with good engineering practices, are adequate for the sites conditions, and are maintained in a proper functioning conditions. Ensure stockpiled topsoil is not incorporated with the BMPs, and remain protected. Date: 09/10/2021

	No		No
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Comments: Erosion BMPs: It was observed in this inspection that stormwater and erosion control BMPs to protect and stabilize the fill slopes of the Location are missing, or insufficient.

Other BMPs:

Corrective Action: Comply with Rule 1002.f.(2) Date: 09/10/2021

Comment:

Corrective Action:  Date:

**On Site Inspection (305):**Surface Owner Contact Information:

Name:  Address:

Phone Number:  Cell Phone:

Operator Rep. Contact Information:

Landman Name:  Phone Number:

Date Onsite Request Received:  Date of Rule 306 Consultation:

Request LGD Attendance: LGD Contact Information:

Name:  Phone Number:  Agreed to Attend:

Summary of Landowner Issues:Summary of Operator Response to Landowner Issues:Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:



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

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment

BMPs to stabilize soils, and to ensure soil horizons remain segregated are missing or insufficient; BMPs to prevent mixing of the segregated/salvaged topsoils, from the soils of the fill slopes are missing.

It was also observed in this inspection that soil salvage of all the topsoil on the Location appears inadequate; Inspector 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.

Corrective Action

Two (2) CAs are being provided:

Date **09/10/2021**

1) Comply with Rules 1002.b.(2) and implement BMPs to stabilize/protect salvaged soils, and to ensure soil horizons remain properly segregated from separate soil horizons.

2) Operator shall submit documentation (calculations, figures, etc..) showing the topsoil depths over the entire disturbance area prior to construction operations, methods used to determine topsoil depth, the actual depth Operator salvaged to, and justifications as to why Operator salvaged to that depth. Operator shall also include the total amount of topsoil (cubic yards) that was salvaged, and figures showing where the material is stored. Operator shall submit documentation to Reclamation Specialist attached to a Form 4 sundry.

1002c. PROTECTION OF SOILS Fail

Comment

It was observed in this inspection that BMPs to protect, stabilize and prevent sediment transport at the stockpiled soils are missing or insufficient; sections of erosion logs implemented at stockpiled soils on the south end of the Location observed to not be installed or maintained in accordance with good engineering practices. There are areas on the north end of the Location where a single row of wattle was observed installed within undisturbed areas, and ~100+ feet from the stockpiled soils; BMP is inadequate as a perimeter control, and as sediment barrier to intercept immediate runoff/sediment from stockpiled soils.

Corrective Action

Comply with Rules 1002.c and 1002.f.

Date **09/10/2021**

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? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

**Overall Interim Reclamation****Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_

Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND \_\_\_\_\_

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 ☐**COGCC Comments**

Comment	User	Date
<p><b>COMMENT #1</b></p> <p>It was observed in this inspection that perimeter controls measures to properly manage stormwater runoff, and to allow for sediment laden-free discharge is missing or insufficient at the Location; a single row of erosion log (straw wattle) observed along perimeter of disturbance, and appears to be the only BMP in place to manage runoff; there are areas on the north end where logs were not installed at the perimeter disturbance, but rather ~100+ feet off the Location; wattle alone is inadequate to properly manage runoff from the large disturbance area.</p> <p>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. See the "Reclamation" section regarding 1002.c "Protection of Soil".</p>	trujilloam	09/08/2021

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

Document Num	Description	URL
402804925	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5526009">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5526009</a>
696203135	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5526008">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5526008</a>