

**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:

10/18/2021

Submitted Date:

10/20/2021

Document Number:

696203245

FIELD INSPECTION FORMLoc ID 335541 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**

OGCC Operator Number: 10447

Name of Operator: URSA OPERATING COMPANY LLC

Address: 950 17TH STREET, SUITE 1900

City: DENVER State: CO Zip: 80202

Status Summary:

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

Findings:

6 Number of Comments

4 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
Ramsey, Scott		scott.ramsey@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	
,		dnr_cogccenforcement@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335541	LOCATION	AC			-	O'Toole A Pad	RI

General Comment:

On 10/18/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountain's O'toole A Pad Location in Garfield County, CO.

Location/Well file show URSA as Operator on record; Form 10 402554498 transferring ownership (effective 12/22/2020) to TEP currently in process

The following compliance issues were observed in this inspection:

606: Unused equipment
1002.f: Stormwater
1003.a: Anchors not marked.
1003: Interim Reclamation

Refer to the "stormwater" and "reclamation" 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.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused tube/pipe observed stored on the south end of the Location		
Corrective Action:	Comply with Rule 606	Date:	10/27/2021

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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 _____

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? Fail

Comment

It was observed in this inspection that anchors on the Location have not been properly marked, or markers are in disrepair. Marker maintenance is an ongoing issue that has been documented in previous inspections; markers appear to be frequently traveled over by vehicle equipment

Corrective Action

Comply with Rule 1003.a; ensure markers are properly maintained. Ensure vehicles avoid traveling over the safety marker equipment.

Date **11/20/2021**

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? **Fail**

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 **Fail**

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

It was observed in this inspection that interim areas of the Location are not progressing towards COGCC 1003 revegetation standards; vegetation predominantly undesirable weedy plant species; little to no desirable vegetative germination and establishment observed on northern interim areas; desirable vegetation was observed on the eastern interim areas, however establishment is not progressing towards uniform vegetative requirements.

Corrective Action

Comply with 1003 rules

Date **12/15/2021**Overall Interim Reclamation **Fail****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: <input style="width: 90%;" type="text"/>	Date: <input style="width: 80%;" type="text"/>					
Overall Final Reclamation <input type="checkbox"/>	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
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comment: <input style="width: 90%;" type="text" value='See "COGCC Comments" for comments regarding stormwater.'/>						
Corrective Action: <input style="width: 90%;" type="text" value="Comply with Rule 1002.f"/>						Date: <input style="width: 80%;" type="text" value="01/05/2021"/>
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

<u>COGCC Comments</u>		
Comment	User	Date
STORMWATER COMMENTS Inspection #700701954 dated 12/1/2020, #700702240 dated 1/28/2021 and #700702711 dated 5/11/2021 observed that control measures to protect and stabilize the slopes and production areas of the Location were missing or insufficient. Inspections required Operator to comply with Rule 1002.f It was observed in this inspection that control measures to protect and stabilize the slopes of the Location remain missing or insufficient; erosion degradation and sediment transport evident. Unclear if control measures on the production areas have been implemented to stabilize the location and prevent offsite sediment transport during wet conditions per previous corrective actions. Inspection #700702711 states that Operator provided their "Piceance Basin Storm water Manual of BMPs (SC-4)" for a tracking pad; tracking pad not observed at time of inspection. Corrective action will remain applicable.	trujilloam	10/20/2021

Attached Documents

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

Document Num	Description	URL
696203246	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5560124