

**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:

11/19/2021

Submitted Date:

11/23/2021

Document Number:

696203374

FIELD INSPECTION FORM

Loc ID 335538 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

Status Summary:
 THIS IS A FOLLOW UP INSPECTION
 FOLLOW UP INSPECTION REQUIRED
 NO FOLLOW UP INSPECTION REQUIRED

Findings:
8 Number of Comments
4 Number of Corrective Actions
 Corrective Action Response Requested

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

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
, TEP		COGCCInspectionReports@terraep.com	
Arthur, Denise		denise.arthur@state.co.us	
Ramsey, Scott		scott.ramsey@state.co.us	
,		dnr_cogccenforcement@state.co.us	
Knudson, Dwayne	970-625-9922	dknudson@ursaresources.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
301819	WELL	XX	04/27/2018	LO	045-18287	Valley Farms F21	RI
335538	LOCATION	AC			-	VALLEY FARMS F PAD	RI

General Comment:

On 11/19/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at the Valley Farms F Pad Location in Garfield County, CO.

Location/Well file shows 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 during this inspection

- Unused equipment
- Noxious Weeds
- Interim Reclamation
- Conductors not plugged/reclaimed
- Stormwater

Refer to the "stormwater", "reclamation" and "good housekeeping" sections 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

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type UNUSED EQUIPMENT

Comment: What appears to be unused separator equipment observed stored next to tank battery. Trailer observed stored on northern production areas of the Location.

Corrective Action: Comply with Rule 606

Date: 12/08/2021

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 301819 Type: WELL API Number: 045-18287 Status: XX Insp. Status: RI

Facility ID: 335538 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: OTHER, RANGELAND

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 REVEGETATION

Cropland

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? _____ F _____

Comment Though plant establishment is evident, it was observed in this inspection that there are interim areas of the Location that are not progressing towards 1003 uniform, desirable vegetative standards. Additionally, eastern slopes were observed to be bare, with little to no desirable plant establishment.
Five (5) Russian Olive plants observed established on the western and northern interim areas; plants are Colorado State listed noxious weeds; weed management required.

Corrective Action Comply with 1003 rules.

Date 03/31/2022

Overall Interim Reclamation In Process

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: OTHER, 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:	Well API 045-18287 has not been drilled; Form 2 permit expired 7/24/2020; Conductor setting has not been plugged/removed; though Operator has placed a pipe in an effort to cover conductor pipe, a required welded plate has not been placed at the top of the conductor pipe; conductor requires plugging/reclamation.	
Corrective Action:	Comply with 406.e.(4)	Date 01/23/2021
Overall Final Reclamation	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:	See "Comment #1" for comments regarding stormwater	
Corrective Action:	Comply with 1002.f	Date: 08/02/2021
Pits:	<input type="checkbox"/> NO SURFACE INDICATION OF PIT	

COGCC Comments

Comment	User	Date
<p>COMMENT #1: Stormwater</p> <p>Inspection Nos. 700701947, 700702257, and 700702930 observed that control measures to protect and stabilize the cut slopes of the Location were missing or insufficient. Inspections required Operator to comply with Rule 1002.f</p> <p>Operator submitted Resolution Nos. 402566126 on 1/5/2021, 402592028 on 2/4/2021, 40279049 dated 8/26/2021 and 402800843 dated 9/2/2021 stating stormwater corrective actions have been completed; comments include : "BMPs have been maintained", "Additional stabilization work on cut slopes has been performed", and "cut slope addressed/stabilized".</p> <p>It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.</p> <p>-Operator appears to have only placed a single straw wattle at the top of the cut slope to manage stormwater run-on; wattle control measure alone is inadequate to stabilize slopes; controls to stabilize and protect the cut slopes remain missing or insufficient per good engineering practices; erosion degradation at cut slopes has persisted.</p> <p>-Erosion blankets observed behind separator equipment; sections of blankets in disrepair; BMP has not been maintained in proper functioning condition.</p> <p>NEW observed stormwater issues per this inspection; Operator has excavated soils around the wellhead; control measures to mitigate sediment transport from stockpiled soils are missing or insufficient. Slopes on the east end of the Location bare and exposed; erosion degradation evident; controls to protect/stabilize slopes missing or insufficient.</p> <p>Corrective actions have not been addressed and remain applicable.</p>	trujilloam	11/23/2021

<p>Stockpiled Soils on Location:</p> <p>It was observed in this inspection that Operator has excavated and stored soils around the Valley Farms F21 conductor; control measures to mitigate sediment transport from stockpiled soils are missing or insufficient.</p> <p>On 10/18/2021 during an inspection at the Valley Farms E Pad (#335542), COGCC Staff observed similar compliance issues regarding missing controls measures at stockpiled soils excavated/stored around a conductor (see inspection #696203249). Operator was provided corrective actions, and implemented controls in response.</p> <p>It is noted that the "Valley Farms E Pad" is adjacent to the "Valley Farms F Pad", and though similar work appears to be in process, and stockpiled soils were observed stored at both Locations with missing stormwater and erosion control measures, Operator implemented controls at the stockpiled soils on the E Pad, while controls were not implemented at the stockpiled soils on the F Pad.</p> <p>Operator does not appear to be taking proactive measures in order to maintain stormwater compliance on their Locations, but rather Operator appears to be using COGCC Staff as "work orders", and only addressing stormwater inadequacies once a "corrective action inspection" has been provided.</p>	<p>trujilloam</p>	<p>11/23/2021</p>
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Attached Documents

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

Document Num	Description	URL
696203375	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5588725