

**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:

03/03/2023

Submitted Date:

03/09/2023

Document Number:

708200024

**FIELD INSPECTION FORM**Loc ID 482780 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 81490

Name of Operator: ST CROIX OPERATING INC

Address: P O BOX 13799

City: DENVER State: CO Zip: 80201

**Status Summary:**

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

**Findings:**

6 Number of Comments

3 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 |
|-------------------|----------------|--------------------------------------|---------|
| Melnychenko, Paul | (303) 489-9298 | stcroixexp@aol.com                   |         |
| Dornbos, Ryan     | 303-915-9074   | ryan@petersonenergyoperati<br>ng.com |         |

**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|---------------|-------------|
| 482780      | LOCATION | AC     |             |            | -         | Horseshoe 1   | RI          |
| 483051      | WELL     | AP     | 10/12/2022  |            | 121-11098 | Horseshoe 1   | RI          |

**General Comment:**

This is a Follow-up Final Reclamation and Stormwater Inspection for PA Well API#121-11098.

| Inspected Facilities |        |       |          |               |           |         |               |               |    |
|----------------------|--------|-------|----------|---------------|-----------|---------|---------------|---------------|----|
| Facility ID:         | 482780 | Type: | LOCATION | API Number: - | Status:   | AC      | Insp. Status: | RI            |    |
| Facility ID:         | 483051 | Type: | WELL     | API Number:   | 121-11098 | Status: | AP            | Insp. Status: | RI |

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

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

Land Use: IRRIGATED

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

**1002 SITE PREPARATION AND STABILIZATION**

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

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment \_\_\_\_\_

This corrective action has not been completed and the location is out of compliance with Rule 1002.b. The operator has provided conflicting information in the FIRR (Doc #403302335) and has explained that 6" of topsoil was removed from a 300'x300' working pad surface for a total of 1,667 cubic yards. However, Staff calculated the actual disturbance area of the location to be approximately 400' x 390', and that approximately 5,801 cubic yards of topsoil should have been salvaged based on the disturbance area of 3.61 acres, as a topsoil depth of 12" (A and AC Horizon) was indicated in the previous inspection (Doc #696105675).

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

This location should have been in compliance during the construction phase. At this stage, if this location does not restore properly following the first growing season after seeding, the Operator will be required to import new topsoil to ensure that the location reaches uniform vegetation cover in accordance with 1004 Rules.

Note: This corrective action will remain in place to monitor the success of the revegetation.

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS Fail

Comment \_\_\_\_\_

Topsoil stockpiles along the access road did not have any evidence of protections against wind and/or water erosion at the time of this inspection. The stockpiles remain unconsolidated and not properly stabilized. Refer to attached inspection photos.

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

Comply with Rule 1002.c. Corrective action date is the date the location was observed out of compliance.

Date **03/03/2023**

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: IRRIGATED \_\_\_\_\_

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: At the time of this inspection, it appears that the topsoil on the drilling pad location has been moved back to it's relative position with evidence of grading and contouring. Operator shall continue to comply with 1004 Rules for final reclamation activities and timing requirements.

Corrective Action: \_\_\_\_\_ Date \_\_\_\_\_

|                           |            |  |  |
|---------------------------|------------|--|--|
| Overall Final Reclamation | In Process | 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 "COGCC Comments" section.](#)

Corrective Action: **Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.**

**The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.**

Date: 01/09/2023

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

| Comment   | User       | Date       |
|---|------------|------------|
| <p><b>Stormwater Comment:</b></p> <p>Corrective action has not been completed and this location does not comply with Rule 1002.f. During this inspection no stormwater or erosion control BMPs were observed on location. The Operator left a voicemail for Staff on 02/15/2023 explaining that an irrigation line had broken on an adjacent center pivot and that the location experienced flooding/ponding of water. Staff observed during this inspection that it appeared the water had run on and off location, originating from the broken line, and appeared to have crossed through the center portion of the location and discharged off location to the east. Staff acknowledges the broken water line was unrelated to oil and gas activities. The Operator needs to install sufficient erosion and stormwater control BMPs in accordance with good engineering practices, immediately. Refer to attached inspection photos for documentation.</p> | edwardsond | 03/09/2023 |

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 708200025    | Inspection Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6046037">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6046037</a> |