

**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:

10/20/2023

Submitted Date:

10/24/2023

Document Number:

708200643

**FIELD INSPECTION FORM**
 Loc ID 465272 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**

OGCC Operator Number: 10774

Name of Operator: SUMMIT OIL &amp; GAS LLC

Address: PO BOX 983038

City: PARK CITY State: UT Zip: 84098

**Status Summary:**

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

**Findings:**

12 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
DULLACK, BRENT		bd@s-companies.com	
PITTSLEY, BENJAMIN		bp@s-companies.com	
BRADLEY, SAM		sb@s-companies.com	Principal Agent

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465267	WELL	AP	06/29/2021	LO	123-50197	Castor 7-59 12-1-10	RI
465268	WELL	AP	06/29/2021	LO	123-50198	Castor 7-59 12-1-7	RI
465270	WELL	AP	06/29/2021	LO	123-50200	Castor 7-59 12-1-9	RI
465271	WELL	PR	10/01/2022	OW	123-50201	Castor 7-59 12-1-3	RI
465272	LOCATION	AC			-	Castor 7-59 12	RI
465273	WELL	PR	08/01/2022	OW	123-50202	Castor 7-59 12-1-1	RI
465275	WELL	AP	06/29/2021	LO	123-50204	Castor 7-59 12-1-8	RI
465276	WELL	PR	10/24/2022	OW	123-50205	Castor 7-59 12-1-5	RI
465277	WELL	AP	06/29/2021	LO	123-50206	Castor 7-59 12-1-11	RI

**General Comment:**

This is a follow-up Interim Reclamation and Stormwater Inspection to previous Field Inspection Reports (Doc #697503330, #697503871, #697504471, and #708200533). This is also in response to FIRR (doc #403531198 and #403554306).

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	It appears that undesirable weedy vegetation (e.g. kochia and russian thistle) previously observed throughout the location has been mechanically managed. The Operator also indicated on FIRR (doc #403531198) that the location has been sprayed for weed control. Previous corrective action has been resolved; the Operator shall continue weed management on the location at all times.		
Corrective Action:		Date:	
Type	TRASH		
Comment:	Trash observed throughout the location. Refer to inspection photos.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	10/20/2023
Type	OTHER		
Comment:	Stained soil was observed around tank battery area and buckets with apparent hydrocarbons observed outside of containment. Refer to attached inspection photos for documentation.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. The location will remain out of compliance until the corrective action has been resolved.	Date:	10/20/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:	During this inspection, Staff observed that load out lines were hung over secondary containment and that load out lines did have bull plugs installed. Operator should consider placing the entirety of the load out lines within secondary containment in the event that a bull plug or valve failure occurs.		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities				
Facility ID: <u>465267</u>	Type: <u>WELL</u>	API Number: <u>123-50197</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465268</u>	Type: <u>WELL</u>	API Number: <u>123-50198</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465270</u>	Type: <u>WELL</u>	API Number: <u>123-50200</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465271</u>	Type: <u>WELL</u>	API Number: <u>123-50201</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465272</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465273</u>	Type: <u>WELL</u>	API Number: <u>123-50202</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465275</u>	Type: <u>WELL</u>	API Number: <u>123-50204</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465276</u>	Type: <u>WELL</u>	API Number: <u>123-50205</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465277</u>	Type: <u>WELL</u>	API Number: <u>123-50206</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>

**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 Pass

Comment Previous FIR (Doc #697504471) required the Operator to import approximately 6300 cubic yards of topsoil by no later than May 1, 2023, and FIR (Doc #708200533) further required the Operator to submit a topsoil and interim reclamation plan after importation activities occurred. Operator submitted FIRR (Doc #403554306) with attachment (Doc #403554338) detailing the topsoil importation and interim reclamation activities. The plan reports that approximately 7150 cubic yards was imported, with 5850 cubic yards redistributed throughout the interim areas and an additional 1300 cubic yards stockpiled on the NW portion of the production areas. This corrective action has been resolved based on field observations and Operator submitted documentation.

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

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS Fail

Comment Previous FIR (doc #708200533) documented undesirable vegetation within the topsoil stockpile and required mitigation to protect soils. During this inspection, Staff observed that the weedy vegetation had been managed (e.g. mowed), however, subsequent reseeding/mulching had not occurred. While the Operator indicated on FIRR (doc #403531198) that a contractor was hired to reseed the location, no apparent reclamation work was observed at this time. All bare/exposed soils shall be protected from wind and water erosion degradation immediately. Additionally, Operator shall restrict all vehicle traffic on stockpiles.

Corrective Action **Comply with Rule 1002.c. The location will remain out of compliance until the corrective action has been resolved.**

Date **10/20/2023**1002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment This location does not comply with Rule 1002.e. During this inspection, Staff observed that the production areas and cut slopes around the perimeter of the location do not appear to be properly stabilized as bare/exposed soils and wind erosion (e.g. blow sand in stormwater ditches) were apparent. Additional stabilization activities are required to protect soils from further wind and water erosion degradation. Refer to attached inspection photos.

Corrective Action **Comply with Rule 1002.e. The location will remain out of compliance until the corrective action has been resolved.**

Date **10/20/2023**

1003a. Waste and Debris removed? \_\_\_\_\_

Comment Refer to "Good Housekeeping" section comments.

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

Date \_\_\_\_\_

Unused or unneeded equipment onsite? Pass

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? Pass

Comment

Corrective Action

Date

Guy line anchors marked? \_\_\_\_\_

Comment

Corrective Action

Date

1003b. Area no longer in use? InProduction areas stabilized ? Fail

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

At the time of this inspection, it appears the Operator is in the process of performing interim reclamation activities with evidence of production areas being reduced in size and the importation of approximately 7150 cubic yards of topsoil that was redistributed throughout the interim areas, as required by previous corrective actions. The Operator indicated on FIRR (doc #403531198) that a contractor was hired to reseed the location at a later date. An inspection will be performed at a future date to ensure compliance with Rule 1003, therefore, this location is being left "In-Process". It is ECMC's expectation that continued interim reclamation activities are performed ASAP.

Corrective Action

Date

Overall Interim Reclamation In Process**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 ☐**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: During this inspection, Staff observed that erosion degradation repairs have been performed (also indicated by the Operator in FIRR doc #403531198). A sediment basin within the northeast corner of the location was constructed, however, portions of the berm were left unconsolidated which can become a source of sedimentation/pollution itself. Inlet/outlet protections are temporary (e.g. straw wattles) and more permanent controls should be considered for long term. Production areas/cut slopes are also unstabilized and stormwater ditches are beginning to fill with blow sand (see also Section 1002.e). Refer to attached inspection photos for documentation.

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective action date is the date the location was observed out of compliance, as the location should be in compliance at all times.

Date: 10/20/2023

Pits: ☐ NO SURFACE INDICATION OF PIT**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
403571365	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6296799">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6296799</a>
708200644	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6296796">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6296796</a>