

**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:

07/18/2024

Submitted Date:

07/22/2024

Document Number:

696205993

**FIELD INSPECTION FORM**

Loc ID: 430927      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:**  
 17 Number of Comments  
 9 Number of Corrective Actions  
 Corrective Action Response Requested

**Operator Information:**  
 ECMC Operator Number: 3104  
 Name of Operator: ANSCHUTZ EXPLORATION CORP  
 Address: 555 17TH ST STE 2400  
 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
Organ, Lindsey	7206391235	lindsey.organ@aec-denver.com	Compliance Specialist

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
430924	WELL	PR	03/01/2023	OW	103-11953	BHR Fed J22-15-397-2RH	RI
430927	LOCATION	AC			-	BHR J22-397	RI
453617	WELL	EP	12/28/2019	LO	103-12295	BHR Fed J22-15-397-4RH	RI

**General Comment:**

On July 18, 2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Anschutz Exploration Corp's BHR J22-397 Location in Rio Blanco County, Colorado.

Location is Fee Surface, with Fed Minerals.

This is also a follow-up inspection to #696205881 to document compliance with the following corrective actions:

- Interim Reclamation of areas not needed for production
- Spill/Release
- Mechanical Condition
- Spill prevention and containment measures
- Protection of topsoil / Weeds
- Anchor Marking requirements

It was observed in this inspection that corrective actions remain outstanding.

Refer to the "Location" and "Reclamation" 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 inspection that have not been addressed are still applicable.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

Overall Good:

<b>Spills:</b>			
Type	Area	Volume	
Comment:	Previous inspections observed spills throughout the working pad surface of the Location. Inspections required Operator to comply with Rule 912.a and to clean spills/impacts to Table 915-1 cleanup concentrations.  Though work to address the CA is in process, stained soils/impacts remain evident on the Location. CA will remain applicable until addressed in its entirety.		
Corrective Action:	Clean up spills/releases per Rule 912.a. Clean/Remediate impacts to Table 915-1 standards.		Date:
Comment:	See "Comment #1" at the end of this report.		
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.		Date:
Comment:	See Comment #2 at the end of this report.		
Corrective Action:	Clean Spill- Remove and properly dispose fluids		Date: <u>08/22/2024</u>
	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.		
Comment:	Spills at the tank loadouts have recurred; honeypot has filled with fluids.		
Corrective Action:	Remove and properly dispose fluids		Date: <u>08/22/2024</u>
Comment:	See comment #1 at the end of this report.		
Corrective Action:	Clean up spills/releases per Rule 912.a		Date: <u>08/22/2024</u>

In Containment: No

Comment:

Multiple Spills and Releases?

<b>Equipment:</b>		corrective date
Type:	#	
Comment:	See "Comment #2" at the end of this report.	
Corrective Action:	Install or repair secondary containment measure; ensure containment measure remains impervious to contain a spill or release.	Date:

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 430924 Type: WELL API Number: 103-11953 Status: PR Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 430927 Type: LOCATION API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 453617 Type: WELL API Number: 103-12295 Status: EP Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**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 SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment [See "Comment #3" at the end of this report.](#)

Corrective Action **CA Per Inspection #696205473:**  
**Comply with Rules 1002.c, 1003.f and 606.c. Ongoing weed management required until site receives a passing final reclamation inspection.**

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 [Inspection #696205678 observed that the Anchors on the east and northeast end of the Location lack proper marking pursuant to Rule 1003.a and 603.j.](#)  
[It was observed in this inspection that the anchors on the west, northwest and northeast corners of the Location have been remarked pursuant to Rules 1003.a and 603.j.](#)  
[Anchor and marker on the southeast end of the Location has been buried- marker has not been installed or maintained. This CA remains applicable.](#)

Corrective Action **CA Per Inspection #696205678:**  
**Comply with Rule 1003.a and 603.j**

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? **Fail**  
 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 See "Comment #4" at the end of this report.

Corrective Action Corrective action per inspection #696205473:  
  
Comply with Rule 1003.b- conduct interim reclamation on the Location including, but not limited to, compaction alleviation, recontouring/regrading, replacement of topsoil and revegetation activities on areas not needed for production. Ensure the seed mixture used is provided by the Surface Owner, or Location Soil Conservation Service. BMPs to stabilize the seeded soils will be required upon completion of revegetation activities. Continue to monitor and manage interim areas until Location receives a passing final reclamation inspection.

Date \_\_\_\_\_

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: <input style="width: 90%;" type="text"/>	
Corrective Action: <input style="width: 90%;" type="text"/>	Date: _____
Overall Final Reclamation <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/>
	Multi-Well Location <input type="checkbox"/>

**ECMC Comments**

Comment	User	Date
<p>Form 2 Permit to drill for the BHR Fed #J22-15-397-4RH well (05-103-11953) expired 12/28/2019.</p> <p>Submit a Form 4 to abandon well. THIS IS THE 4TH NOTICE ECMC STAFF HAS PROVIDED TO OPERATOR.</p>	trujilloam	07/22/2024
<p><b>COMMENT #4</b></p> <p>Previous Inspections observed that interim reclamation pursuant to 1003 Rules has not been performed on the Location; areas on the west end of the Location are not reasonably needed for production operations on the Location, and require reclamation. Areas on the south end of the Location have not been reclaimed (gravel/rock material/road base evident and require removal). A 2nd access road exists on the east end of the Location; access road is unnecessary and also requires reclamation. Inspection required Operator to comply with Rule 1003.b. It was observed in this inspection that interim reclamation has NOT been conducted in accordance with 1003 Rules.</p> <p>Inspection #69620588 observed that interim reclamation work was apparent, however compaction alleviation (Cross-ripped to a minimum depth of 18 inches) was not performed in accordance with Rule 1003.c. Operator appears to have only roughened the top 1-3 inches of soil; compaction issues evident. Operator also appears to have mixed any gravel/road base material that was previously identified within these areas, rather than removing the material per CAs. Inspection also observed that the topsoil stockpile on the east end of the Location remains intact; Operator has not replaced topsoil during reclamation work.</p> <p>It was observed in this inspection that interim reclamation pursuant to 1003 Rules has not been performed; compaction remains apparent within the interim areas and the access road.</p> <p>This corrective action has not been addressed and remains applicable.</p>	trujilloam	07/22/2024
<p><b>COMMENT #3</b></p> <p>Previous inspections observed that BMPs to prevent weed establishment was inadequate at the topsoil stockpile; Undesirable Plant Species, including various mustard species (e.g. <i>Chorispora tenella</i>) observed over much of the topsoil stockpile. Inspection required Operator to comply with Rules 1002.c, 1003.f and 606.c.</p> <p>Unable to find evidence that BMPs and weed management activities to keep the topsoil stockpile free of Undesirable Plant Species have been implemented. Topsoil stockpile remains predominantly Undesirable Plant Species including Cheatgrass and mustards; work to address the corrective actions have not been performed, or has been inadequate.</p> <p>It is also noted that additional reclamation efforts have been conducted on the Location, however, topsoil stockpile remains intact- topsoil material has not been replaced over interim areas during reclamation work.</p>	trujilloam	07/22/2024

<p><b>COMMENT #2</b></p> <p>Inspection #696205678 observed that the partially buried containment BMP behind the compressor unit was not in proper functioning condition; lines leading into BMP are either leaking, and/or have not been properly sealed to the containment measure. Spills observed around the containment BMP. Inspection required Operator to install or repair secondary containment measure and to ensure containment measure remains impervious to contain a spill or release.</p> <p>It was observed in this inspection that the secondary containment BMP remains unchanged and inadequate. Additionally, fluids were observed spilled within the containment measure; tank stored within the BMP appears to be leaking.</p> <p>CA will remain applicable until work has been addressed in its entirety.</p>	<p>trujilloam</p>	<p>07/22/2024</p>
<p><b>COMMENT #1</b></p> <p>Previous inspection observed leaking at separator equipment, and other equipment (including the compressor) on the northeast end of the Location appears to have been controlled. Operator previously stated that a hole exists at the produced water tank; Operator plans on removing tank.</p> <p>It was observed that the tank with hole remains on Location.</p> <p>Additionally, the spill at the compressor appears to be recurring as fluids were observed spilled within the equipment.</p> <p>It is noted that work to address the CA is in process, however, CA will remain applicable until addressed in its entirety and all facilities on the location have been maintained in a good mechanical condition. Work to maintain compressor equipment required.</p>	<p>trujilloam</p>	<p>07/22/2024</p>

**Attached Documents**

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

Document Num	Description	URL
696205994	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6634280">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6634280</a>