

**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:

09/26/2024

Submitted Date:

09/30/2024

Document Number:

696206335

**FIELD INSPECTION FORM**Loc ID 430927 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: **Operator Information:**

ECMC Operator Number: 3104

Name of Operator: ANSCHUTZ EXPLORATION CORP

Address: 555 17TH ST STE 2400

City: DENVER State: CO Zip: 80202

**Status Summary:**

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

**Findings:**

10 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
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

**General Comment:**

On 9/26/2024, Western Reclamation Work Lead 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 and #696205993 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: 1-888-696-1300 / 911

Corrective Action:

Date:

Overall Good: ☐**Spills:**

Type	Area	Volume		
Comment:	Previous inspection observed equipment/pipe throughout the Location with leaks, resulting in spills onto the surface of Location/Pad. Inspections required Operator to comply with Rule 608.e.			
	It was observed in this inspection that leaks remain apparent at pipe equipment on the northeast end of the Location, resulting in additional spills. Work to address the compliance issues has not been performed, or has been insufficient.			
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:	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.			
	It was observed in this inspection that spills have recurred within the same areas of the Location identified in previous inspections. Unclear if cleanup operations had been performed prior to new spills. This CA will remain applicable.			
Corrective Action:	Clean up spills/releases per Rule 912.a. Clean/Remediate impacts to Table 915-1 standards.			Date:

In Containment: No

Comment: Partially buried vessel behind compressor area has been re-installed, and areas around tank have been cleaned. This CA has been resolved.

☐ Multiple Spills and Releases?**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									

**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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

Previous inspections observed that BMPs to prevent weed establishment was inadequate at the topsoil stockpile; Undesirable Plant Species, including various mustard species (e.g. *Chorispora tenella*) observed over much of the topsoil stockpile. Inspection required Operator to comply with Rules 1002.c, 1003.f and 606.c.

It was observed in this inspection that mowing operations appear to have been performed. This CA is being considered "in process", however timing has been inadequate to prevent further spread. Additional weed management efforts will need to be performed during the future growing season; ongoing weed management efforts required.

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 Previous inspections observed that the Anchor on the east end of the Location was missing proper marking pursuant to Rule 1003.a and 603.j.

It was observed in this inspection Anchor remains buried, and that a 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-CroplandTop soil replaced Fail 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 See "COGCC Comments" at the end of this report.Corrective Action Corrective action per inspection #696205473:

Date \_\_\_\_\_

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.

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: 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
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comment:

Operator has impacted materials stored within a lined containment berm on the west end of the Location.  
It was observed in this inspection that holes/tears have developed within the liner; BMP no longer sufficiently impervious.

Corrective Action:

Maintain BMP to ensure impacted materials are sufficiently contained.

Date:

10/07/2024

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments		
Comment	User	Date
<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-rippled 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, and topsoil has not been replaced.</p> <p>This corrective action has not been addressed and remains applicable.</p>	trujilloam	09/30/2024

Attached Documents

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

Inspector Name: Trujillo, Aaron

Document Num	Description	URL
403940498	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6728140">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6728140</a>
696206336	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6728122">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6728122</a>