

**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:

09/30/2024

Submitted Date:

10/09/2024

Document Number:

708201671

FIELD INSPECTION FORMLoc ID 471039 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 10814

Name of Operator: MDS ENERGY DEVELOPMENT LLC

Address: 409 BUTLER RD SUITE A

City: KITTANNING State: PA Zip: 16201

Status Summary:

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

Findings:

10 Number of Comments

1 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
SAADEH, RICHARD		richard.saadeh@mdsed.com	
		jim.jacobsen@iptwell.com	
		kelsi.welch@iptwell.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
471039	LOCATION	AC			-	Castor 7-59 10	RI
471064	WELL	PR	11/01/2023	OW	123-50750	CASTOR 7-59 10-3-1	RI
471065	WELL	PR	11/01/2023	OW	123-50751	CASTOR 7-59 10-3-5	RI
471066	WELL	PR	11/01/2023	OW	123-50752	CASTOR 7-59 10-3-8	RI
471069	WELL	PR	12/01/2023	OW	123-50755	CASTOR 7-59 10-3-12	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (471039) and to the previous FIR (doc #708201524) conducted on 08/19/2024.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Undesirable vegetation (e.g. russian thistle and kochia) was observed throughout the location. At the time of this inspection, on-site Lease Operator (Alec) explained to Staff that weeds were sprayed with herbicide. Operator shall continue to monitor and manage the location for undesirable vegetation.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Previous inspections have documented stained soil throughout the location, including near production equipment (compressor) and loadout lines. Operator subitted FIRR (doc #403915024) stating that the corrective action has been completed. During this inspection, it was observed that stained soil appears to have been disposed of; trace amounts of stained pea gravel remain in the tank battery secondary containment. Operator shall continue to monitor and manage the location for stained soil and implement BMPs where nescessary.		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type: Other	#		corrective date
Comment:	Previous inspection (doc #708201524) documented a possible mixture of hydrocarbons and stormwater within the rat/mouse hole of Well API 123-50751. Operator submitted FIRR (doc #403915024) stating that the corrective action has been completed. During this inspection, Staff observed that stained soil/gravel remained at the rat hole near the wellhead. While on site, Staff showed/explained the stained soil to on-site Lease Operator (Alec) who advised Staff that it would be cleaned up that same day. Before leaving the location, Staff re-inspected the rat hole and it appeared that the stained soil was removed and backfilled with fresh gravel.		
Corrective Action:		Date:	
Type: Other	#		
Comment:	Previous inspections documented subsidence around wellheads. Operator submitted FIRR (doc #403915024) stating that the corrective action has been completed. During this inspection, no subsidence was observed around the wellheads.		
Corrective Action:		Date:	
Type: Bird Protectors	#		
Comment:	Previous inspection (doc #708201524) documented no cover or netting was observed around an open rat hole near Well API 123-50751. Operator submitted FIRR (doc #403915024) stating that the corrective action has been completed. During this inspection, it appears that the rat hole has been buried/filled with gravel to exclude entry.		
Corrective Action:		Date:	

Type: Compressor	#		
Comment:	Previous inspection (doc #708201524) documented a 5 gallon bucket outside of secondary containment at one of the compressors. Operator submitted FIRR (doc #403915024) stating that the corrective action has been completed. During this inspection, it appears that the 5 gallon bucket has been removed from location.		
Corrective Action:		Date:	
Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

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 _____ In _____

Comment

During this inspection, it appears that topsoil has been imported to the location and spread throughout the interim reclamation areas. It was also observed that the western portion of the existing topsoil stockpile appears to have had an amount of topsoil removed (approximately 60' x 75'). When submitting the FIRR for the outstanding corrective action, the Operator shall also provide an explanation of missing topsoil from the existing topsoil stockpile. Operator is also being advised that per COA on Form 4 (doc #403684816) documentation (e.g. manifests, truck counts, photos, etc) of topsoil importation is required when submitting FIRR. This is being left "In-Process" until the FIRR is submitted.

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 REVEGETATIONCropland

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

It appears that interim reclamation activities have been performed to reduce disturbance areas only needed for production operations. Topsoil has been imported to the location and spread throughout the interim areas which appear to have been recontoured. It does not appear that the interim areas have been reseeded at the time of this inspection. Operator shall continue to monitor and manage this site until the location meets Rule 1003 standards, including stormwater and weed management. Operator shall submit a Form 4 Interim Reclamation Complete notice when the location meets Rule 1003 standards. ECMC may conduct inspections prior to receiving said notice to ensure compliance with Rule 1003.

Corrective Action

Date _____

Overall Interim Reclamation

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:			Date
Corrective Action:			
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
<div>Comment: This location does not comply with Rule 1002.f. Operator submitted FIRR (doc #403915024) stating that the corrective action has been completed. It does not appear that any stormwater maintenance/installations have occurred since the previous inspection. Perimeter stormwater controls appear to have been removed, including ditch and berms, and the sediment trap located on the northwest corner of the disturbance area. Refer to attached inspection photos.</div> <div>Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C immediately. (Original CA Date: 08/23/2024).</div>						Date:
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
403951761	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6739796
708201677	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6739792