

**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:

02/03/2025

Submitted Date:

02/04/2025

Document Number:

718700031**FIELD INSPECTION FORM**Loc ID 471039 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: **Operator Information:**ECMC Operator Number: 10814Name of Operator: MDS ENERGY DEVELOPMENT LLCAddress: 409 BUTLER RD SUITE ACity: KITTANNING State: PA Zip: 16201**Status Summary:**

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

Findings:13 Number of Comments9 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
		kelsi.welch@iptwell.com	
SAADEH, RICHARD		richard.saadeh@mdsed.com	
Heibel, Krystal		krystal.heibel@state.co.us	
		jim.jacobsen@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 #708201671) conducted on 09/30/2024.

Operator submitted FIRR (doc #403967157) on 11/07/2024 stating that corrective actions have been completed.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	OTHER		
Comment:	Hydrocarbon staining was observed throughout the location. This has been documented in previous FIRs and is an ongoing compliance issue. Refer to attached inspection photos.		
Corrective Action:	Conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f(2).D	Date:	02/08/2025
Type	DEBRIS		
Comment:	Trash and debris was observed throughout the location and production equipment. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606 to remove all trash and debris.	Date:	02/11/2025

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type: Compressor	#		corrective date
Comment:	Gas can laying on its side and outside of secondary containment, near compressor. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 1002.f.(2)B to implement or modify BMPs for improved material handling and spill prevention.	Date:	02/06/2025
Type: Other	#		
Comment:	Wellhead and associated equipment (e.g. valves, piping, etc) were observed to have visible hydrocarbon staining. Refer to attached inspection photos.		
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:	02/05/2025
Type: Bird Protectors	#		
Comment:	No cover or netting was observed around open rat/mouse hole at Well API 123-50751; hydrocarbons were observed within opening at the time of this inspection. Refer to attached inspection photos.		
Corrective Action:	Install or repair wildlife protection equipment per Rule 902.b.	Date:	02/05/2025
Type: Other	#		
Comment:	Pothole/subsidence observed on the northeast corner of the production facilities, north of tank battery. Refer to attached inspection photos.		
Corrective Action:	Operator shall immediately ensure operations are safe and will properly install safety controls and/or backfill the observed hole/subsidence pursuant to Rule 602.c.	Date:	02/05/2025

Venting:

Yes/No			
Comment:			

Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 471039 CDP: _____

Comment: A wildlife mortality was observed within the production areas, near the well locations. ECMC Staff spoke with on-site Pumper and recommended that the Operator to reach out to CPW to notify of the mortality. This is being entered for documentation purposes.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: _____

Corrective Action: _____ Date: _____

On Site Inspection (305):Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

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Summary of Operator Response to Landowner Issues:

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Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

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Environmental			
Spills/Releases:			
Type of Spill: OTHER E&P WASTE		Estimated Spill Volume: _____	
Comment:	Pooled hydrocarbons were observed next to the wellhead (API #123-50751), inside of the rat/mouse hole area. This was previously documented in FIR (doc #708201524) conducted on 08/19/2024. Refer to attached inspection photos.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a. In accordance with 913.d. (1) Operator will investigate impacts to soil, groundwater, and surface water as soon as the impacts are discovered. The operator shall report the spill/release via Form 19 to the ECMC. Contact ECMC Staff Krystal Heibel (krystal.heibel@state.co.us) with any questions.		Date: 02/05/2025
Reportable: YES	GPS: Lat _____	Long _____	
Proximity to Surface Water: _____		Depth to Ground Water: _____	
Water Well Complaint:			
DWR Receipt Num: _____	Owner Name: _____	GPS : _____	Lat _____ Long _____
Field Parameters:			
Sample Location: _____		Comment: _____	

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 Fail

Comment

Previous FIR (doc #708201671) documented that topsoil appeared to have been imported to the location and spread throughout the interim reclamation areas. It also documented that the western portion of the existing topsoil stockpile appeared to have had an amount of topsoil removed (approximately 60' x 75').

In order to comply with the outstanding corrective action and COA on Form 4 (doc #403684816), Operator is required to submit documentation (e.g. manifests, truck counts, photos, etc) of topsoil importation and explanation of missing topsoil from the existing stockpile.

Corrective Action

Submit FIRR with documentation of topsoil importation activities and explanation of missing topsoil from existing stockpile.

Date _____

1002c. PROTECTION OF SOILS Fail

Comment

This location does not comply with Reclamation rules. Rule 1002.c. states all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Topsoil stockpile has significant weed cover (russian thistle and kochia) with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth.

Corrective Action

Best management practices to prevent weed establishment shall be implemented. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted.

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

Appears the Operator has performed interim reclamation activities to reduce disturbance areas only needed for production operations, with the evidence of drill rows and straw crimped mulch. 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 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, it was observed that a perimeter ditch and berm, and sediment traps have been constructed around the production facilities and well locations. No stormwater erosion issues were observed at this time.

Operator shall continue to monitor and manage this site for stormwater run on and runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004.

Corrective Action: _____

Date: _____

Pits: ☐ 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
718700032	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6904423