

**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:

04/14/2025

Submitted Date:

04/23/2025

Document Number:

718100478**FIELD INSPECTION FORM**Loc ID 312420 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC Operator Number: 10150Name of Operator: BLACK HILLS PLATEAU PRODUCTION LLCAddress: 1515 WYNKOOP ST STE 500City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:6 Number of Comments2 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
,		dnr_cogccenforcement@state.co.us	
		casey.kimble@blackhillscorp.com	Principal Agent
Maxwell, Logan		logan.maxwell@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221554	WELL	PA	07/27/2007	GW	077-08156	BLAIR 1	RI
312420	LOCATION	CL			-	BLAIR-610S97W 1SWNE	RI

General Comment:

On 4/14/2025, Western Reclamation Work Lead Trujillo conducted a Final Reclamation inspection at Black Hills Plateau Production LLC's Blair #1 Location in Mesa County, Colorado.

Location is within the following High Priority Habitats: Severe Elk Winter Range

This inspection is a follow-up to Inspection Nos. 696204845 dated 4/17/2023, 696203693 dated 5/10/2022, and #696204247 dated 10/11/2022 to document compliance with the following corrective actions:

- Final Reclamation/Plugging and Abandonment requirements
- Stormwater

This inspection is also in response to NOAV #403384691 related to 1002.f Stormwater and 1004.a Final Reclamation requirements.

This inspection is also at the request of the Hearings Unit, in response to Docket No. 230600210 requesting a variance to 1004 Rules, to not reclaim the Location and access road.

It was observed in this inspection that the Location remains out of compliance with ECMC Rules.

Refer to the Reclamation and Stormwater sections of this inspection report for additional details.

Refer to the photo-documentation attached to this report.

Any corrective action(s) from previous inspection that have not been addressed are still applicable.

Inspected Facilities									
Facility ID:	221554	Type:	WELL	API Number:	077-08156	Status:	PA	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	312420	Type:	LOCATION	API Number:	-	Status:	CL	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: _____

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 _____

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 _____

Corrective Action _____ Date _____

Overall Interim Reclamation**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads _____ Regraded **Fail** _____ Contoured **Fail** _____ Culverts removed _____

Gravel removed **Fail** _____

Location and associated production facilities reclaimed **Fail** _____ Locations, facilities, roads, recontoured _____

Compaction alleviation **Fail** _____ Dust and erosion control **Fail** _____

Non cropland: Revegetated 80% **Fail** _____ Cropland: perennial forage _____

Weeds present **Fail** _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: [See "COGCC Comments" at the end of this report.](#)

Corrective Action: **Comply with Rule 434.a.(5) abandoned well marker requirements.** Date _____

Overall Final Reclamation _____ In Process _____ 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: [See "COGCC Comments" at the end of this Report.](#)

Corrective Action: **Comply with 1002.f and install required stormwater and erosion control BMPs at the Location and access road to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be installed in accordance with good engineering practices, and maintained until Location receives a passing final reclamation inspection.**

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>FINAL RECLAMATION COMMENTS</p> <p>Previous inspection observed that Final Reclamation has not been conducted in accordance with COGCC 1004 requirements; Reclamation at the Location and Access road including, but not limited to, removal of gravel, compaction alleviation, recontouring/regrading and revegetation activities has not been conducted; cut and fill slopes remain evident; noxious weed establishment evident.</p> <p>Inspections also observed that Operator has left a welded plate at surface of the well as a "marker"; markers are required to be a piece of pipe not less than 4 inches in diameter and not less than 10 feet in length, of which 4 feet shall be above the general ground level; monument left at surface does not comport with abandoned well marker requirements.</p> <p>Inspections required Operator to:</p> <p>1) Comply with Rules 1004.a, and conduct final reclamation with, at a minimum, the removal of gravel/road base, compaction alleviation, recontouring and regrading activities to be completed by 7/31/2022, and revegetation activities required to be completed no later than 11/15/2022, and:</p> <p>2) Comply with Rule 434.a.(5) well marker requirements.</p> <p>On June 14, 2023, Operator submitted Docket No. 230600210 requesting a variance from Rules 1004.c.(2), 1004.d., and 1004.e.</p> <p>It was observed in this inspection that final reclamation activities, pursuant to 1004 requirements, have not been conducted: Gravel/Road base has not been removed from the access road and Location; Access road and Location has not been decompacted, recontoured/regraded, and revegetation activities have not been performed. However, the overall status of the Reclamation is being considered "in process" pending resolution of the Variance Hearing Application.</p> <p>It was also observed in this inspection that Operator has failed to remove and/or install a well marker that comports with ECMC Well abandonment requirements. This portion of the corrective action remains applicable.</p>	trujilloam	04/23/2025

STORMWATER

trujilloam

04/23/2025

Previous inspections observed that BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation are missing or insufficient at the Location and access road; stormwater runoff has resulted in erosion at the exposed cut and fill slopes of the Location resulting in degradation and sediment transport; gully erosion also evident along access road. Inspection required Operator(s) to comply with 1002.f by 10/27/2022.

NOAV #403384691 was issued on 4/26/2023, and required Operator to comply with Rule 1002.f by 5/1/2023.

It was observed in this inspection that corrective actions and NOAV abatement requirements, to address the stormwater and erosion degradation issues have not been taken by the Operator(s); erosion, degradation and sediment transport at the Location and access road has persisted.

Attached Documents

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

Document Num	Description	URL
718100479	Inspection Photo and Drone Report	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7018323