

**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:

06/04/2025

Submitted Date:

06/16/2025

Document Number:

718300006

**FIELD INSPECTION FORM**Loc ID 321182 Inspector Name: Anderson, Laurel On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

ECMC Operator Number: 16830

Name of Operator: CHOLLA PRODUCTION LLC

Address: 10390 BRADFORD RD #201

City: LITTLETON State: CO Zip: 80127

**Status Summary:**

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

**Findings:**4 Number of Comments  
2 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
Sanchez, Chris		chris.sanchez@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Costa, Ryan		ryan.costa@state.co.us	
Goff, Bill	303-249-0430	cholla_production@msn.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
488363	SPILL OR RELEASE	AC	10/29/2024		-	TANK BATTERY OF BIG BEAR 1-36	EI

**General Comment:**

ECMC Field Inspection Report Summary

This is an environmental inspection to determine progress on Spill ID 488363. Any corrective actions from previous inspections, NOAVs and/or conditions of approval from previous forms that have not been fully addressed are still applicable. There were no operator or contract environmental personnel on location at the time of this field inspection. Photos attached to document site conditions.

Operator: CHOLLA PRODUCTION LLC

Location ID: 321182

Location: BIG BEAR-630S43W36NESW

Spill/Release Point: TANK BATTERY OF BIG BEAR 1-36

Spill ID 488363

Date of Discovery: 10/14/2024

Date of Inspection: 6/4/2025

Days Open (as of 6/12/2025): 241 days

Relevant Forms:

Form 19i: Doc #403968412

Field Inspection Reports: Doc Nos. 690200367 & 713601523

Current site status:

-Former tank battery has not established vegetation.

See attached corrective actions.

Per Field Inspection performed on 6/22/2020 (FIR Doc #690200367):

"There was no crop growth observed at the well site area. The area is approximately 60'x60' which is at the site of the former well and pumpjack area. Soils need to be evaluated for potential issues such as compaction. Proper soil decompaction needs to be performed by cross ripping to a depth of 18 inches. A soil analysis should be performed to determine if there are soil issues preventing crop growth." ECMC required the Operator complete the following Corrective Action: "Comply with 1004 Rules" by: 07/31/2020.

Per Field Inspection performed on 10/14/2024 (FIR Doc #713601523):

"There appears to be historic spill impacts at the abandoned well site that have affected the soils preventing crop establishment." ECMC required the Operator complete the following Corrective Action: "Submit Form 19 to report historic spill of impacted material per Rule 912.b." by: 10/22/2024.

Per FIR Doc #713601523: "There was no crop growth observed at the well site area approximately 60'x60'. This reclamation issue was also documented in the previous inspection. The surrounding undisturbed area is planted into winter wheat which is actively growing. There appears to be soil impacts from the wellsite which will require soil sampling, remediation, and reclamation. Any impacted soils should be removed and replaced with suitable topsoil for reclamation."

Inspected Facilities									
Facility ID:	488363	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental	
<b>Spill/Remediation:</b>	
Comment:	Operator shall submit delinquent form(s) for this project; the forms must address all outstanding conditions of approval/corrective actions to date.
Corrective Action:	<div>Operator shall submit a Form 27i for Site Investigation and Remediation of Spill ID #488363 as soon as possible and notify the Area EPS upon submission. As soon as the Form 27 Initial is approved, Operator shall submit a Form 19 Supplemental Report with any information not provided in the initial Form 19 and for the purpose of requesting closure of Spill ID #488363 as work will proceed under a Form 27.</div> <div>Date: 06/30/2025</div>
Emission Control Burner (ECB): _____	
Comment:	_____
Pilot: _____	Wildlife Protection Devices (fired vessels): _____

**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 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 \_\_\_\_\_

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 \_\_\_\_\_ 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: [Previous Field Inspections performed on 6/22/2020 \(FIR Doc #690200367\) and 10/14/2024 \(FIR Doc #713601523\) documented that there was no crop growth observed at the former well site area. At the time of inspection on 6/12/2025 portions of the former well site area remained unvegetated and it did not appear that any remediation or reclamation activities had taken place since the previous inspection.](#)

Corrective Action:	Original Corrective Action due date(s) from previous Field Inspection Reports remain applicable.	Date
Overall Final Reclamation	Fail	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

**ECMC Comments**

Comment	User	Date
<p>Operator submitted Form 19i Doc #403968412 on 10/23/2024; ECMC conditionally approved the Form with the following COAs:</p> <p>1). "Within 10 days of approval of this Form 19, Operator shall submit a Supplemental Form 19 with the Following Information.</p> <p>A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill</p> <p>B. All pertinent information about the spill/release known to the Operator that has not been reported previously including photo documentation showing the impacted area, and initial investigation activities</p> <p>C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator</p> <p>D. Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2).A did not meet the requirements of Rule 216.</p> <p>E. A map identifying proposed sample locations.</p> <p>F. A timeline for spill investigation/soil sample collection."</p> <p>2). "Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director."</p> <p>3). "Operator did not report if local government, surface owner, and director has been notified as required by Rule 912.b. (2).B. Operator shall submit documentation of notification with the next Supplemental Form 19."</p> <p>4). "Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)). The impacted soil will be segregated for proper offsite disposal and the lateral and vertical extent of impacts shall be determined with appropriate confirmation soil sampling."</p>	andersoln	06/16/2025

**Attached Documents**

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

Document Num	Description	URL
718300007	Photo Log	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7096332">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7096332</a>