

**FORM  
INSP**Rev  
05/11**State of Colorado****Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



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Inspection Date:

03/17/2014

Document Number:

668401926

Overall Inspection:

Satisfactory**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection
	412081	413761	BROWNING, CHUCK	<input type="checkbox"/> 2A Doc Num: _____

**Operator Information:**

OGCC Operator Number:

Name of Operator: WPX ENERGY ROCKY MOUNTAIN LLCAddress: 1001 17TH STREET - SUITE #1200City: DENVER State: CO Zip: 80202

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☐ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

Contact Name	Phone	Email	Comment
ELLSWORTH, STUART		stuart.ellsworth@state.co.us	
Carter, Peggy	970-263-2750	Peggy.Carter@wpxenergy.com	Operations Engineer
KOEHLER, BOB		bob.koehler@state.co.us	
Browning, Chuck	970-433-4139	chuck.browning@state.co.us	Field Inspector

**Compliance Summary:**

QtrQtr:	SWNE	Sec:	1	Twp:	7S	Range:	96W
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Unsatisfactory	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
07/05/2013	663801227	IJ	WK	Satisfactory			No
10/31/2012	663800555	IJ	SI	Satisfactory	I		No
09/30/2011	200323465	MI	SI	Satisfactory			No
08/09/2011	200318896	RT	AC	Satisfactory			No
07/14/2010	200262193	PR	AC	Satisfactory			No
11/24/2009	200224036	MI	SI	Satisfactory			No
09/15/2009	200218289	MI	PD	Satisfactory			No

**Inspector Comment:**UIC-MIT to test casing leak repair.See Form 21 Doc #01171570**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
159295	UIC DISPOSAL	AC	10/20/2009		-	GM 923-1D INJECTION WELL	AC	<input checked="" type="checkbox"/>
159296	UIC DISPOSAL	AC	10/21/2009		-	GM 943-1D INJECTION WELL	AC	<input type="checkbox"/>
159297	UIC DISPOSAL	AC	10/20/2009		-	GM 931-1D INJECTION WELL	AC	<input type="checkbox"/>
412081	WELL	IJ	05/06/2009	STRT	045-18424	Williams GM 923-1D	AC	<input checked="" type="checkbox"/>
412082	WELL	IJ	05/06/2009	STRT	045-18425	Williams GM 931-1D	IJ	<input type="checkbox"/>

412083	WELL	IJ	08/05/2013	DSPW	045-18426	Williams GM 943-1D	IJ	
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**Equipment:**Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: <u>3</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: <u>1</u>	Separators: <u>1</u>	Electric Motors: _____
Gas or Diesel Motors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: <u>1</u>	Oil Pipeline: _____	Water Pipeline: <u>2</u>
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

**Location****Lease Road:**

Type	Satisfactory/Unsatisfactory	comment	Corrective Action	Date
Main	Satisfactory			
Access	Satisfactory			

**Signs/Marker:**

Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date
WELLHEAD	Satisfactory			

Emergency Contact Number: (S/U/V) Satisfactory

Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

**Spills:**

Type	Area	Volume	Corrective action	CA Date
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☐ Multiple Spills and Releases?**Venting:**

Yes/No	Comment

**Flaring:**

Type	Satisfactory/Unsatisfactory	Comment	Corrective Action	CA Date

**Predrill**Location ID: 412081**Site Preparation:**

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/U/V:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

Group	User	Comment	Date
OGLA	kubeczkod	SITE SPECIFIC COAs:  Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for	04/25/2013

hydraulic stimulation operations).

Surface water samples from Hayes Gulch to the west-southwest (one upgradient and one downgradient from the well pad location), shall be collected prior to injection well operations and every 12 months (until well pad closure) to evaluate potential impacts from operations. At a minimum, the surface water samples will be analyzed for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

Operator must submit an as-built drawing (plan view and cross-sections) of the SWD injection well pad and associated equipment within 30 calendar days of completion of the injection wells.

Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface or buried pipelines.

Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

If the wells are to be hydraulically stimulated, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.

Operator will use qualified containment devices for all appropriate chemicals/hazardous materials used onsite during the operation of the injection wells.

All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure a minimum of 110 percent secondary containment for the largest structure containing fluids within each bermed area the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

Operator shall equip and maintain on all tanks an electronic level monitoring device.

Operator shall install a steel containment ring around tank batteries to provide secondary containment and install a synthetic liner that underlies the entire battery and is keyed into the top of the containment ring.

Approval of this Form 2A does not authorize operator the right to inject. Authorization to inject into the selected Formation(s) requires approval of both the Form 31 and the Form 33.

Before hydraulic stimulation of the each well, operator shall collect a groundwater

		sample from the Ohio Creek and analyze for total dissolved solids (TDS); submit laboratory analytical results to denise.onyskiw@state.co.us and arthur.koelspell@state.co.us.	
OGLA	kubeczkod	<p>PIPELINE COAs:</p> <p>Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service.</p> <p>Operator must implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located.</p> <p>Operator must routinely inspect the entire length of the surface pipeline to ensure integrity.</p> <p>Operator must ensure 110 percent secondary containment for any potential volume of fluids that may be released from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings.</p> <p>Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.</p>	04/25/2013

**S/U/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Wildlife BMPs:**

BMP Type	Comment
Construction	<p>Construction</p> <ul style="list-style-type: none"> <li>• Schedule necessary construction in stream courses to avoid critical spawning times.</li> <li>• Surface roads to ensure that the anticipated volume of traffic and the weight and speed of vehicles using the road do not cause environmental damage, including generation of fugitive dust and contribution of sediment to downstream areas.</li> <li>• Protect culvert inlets from erosion and sedimentation and install energy dissipation structures at outfalls</li> <li>• Use the minimum right-of-way width and vegetation mats where pipelines cross riparian areas and streams wherever possible</li> <li>• Construct fluid pit fences and nets that are capable of withstanding animal pressure and environmental conditions and that are appropriately sized for the wildlife encountered.</li> <li>• Install impermeable barriers beneath fluid pits to protect groundwater, riparian areas and wetlands.</li> <li>• Salvage topsoil from all road construction and other rights-of-way and re-apply during interim and final reclamation.</li> <li>• Strip and segregate topsoil prior to construction. Appropriately configure topsoil piles and immediately seed to control erosion, prevent weed establishment and maintain soil microbial activity</li> </ul>
Interim Reclamation	<p>Production/Reclamation</p> <ul style="list-style-type: none"> <li>• Gate access roads where necessary to minimize/control access to "crucial habitats"</li> <li>• Install automated emergency response systems (e.g., high tank alarms, emergency shut- down systems, etc.).</li> <li>• Implement fugitive dust control program</li> <li>• Avoid direct discharge of pipeline hydrostatic test water to any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.</li> <li>• Locate above-ground facilities to minimize the visual effect (e.g., low profile equipment, appropriate paint color, vegetation screening in wooded areas, etc.).</li> <li>• Skim and eliminate oil from produced water ponds and fluid pits at a rate sufficient to prevent oiling of birds or other wildlife that could gain access to the pit.</li> <li>• Apply an aggressive, integrated, noxious and invasive weed management plan. Utilize an adaptive management strategy that permits effective responses to monitored findings and reflects</li> </ul>

local site and geologic conditions

- Map the occurrence of existing weed infestations prior to development to effectively monitor and target areas that will likely become issues after development.
- Evaluate the utility of soil amendment application or consider importing topsoil to achieve effective reclamation.
- Use locally adapted seed whenever available and approved by landowner.
- Use appropriately diverse reclamation seed mixes that mirror an appropriate reference area for the site being reclaimed where approved by landowner.
- Conduct seeding in a manner that ensures that seedbed preparation and planting techniques are targeted toward the varied needs of grasses, forbs and shrubs (e.g., seed forbs and shrubs separately from grasses, broadcast big sagebrush but drill grasses, etc.)
- Emphasize bunchgrass over sod-forming grasses in seed mixes in order to provide more effective wildlife cover and to facilitate forb and shrub establishment.
- Seed during appropriate season to increase likelihood of reclamation success
- Do not include aggressive, non-native grasses in reclamation seed mixes
- Choose reference areas as goals for reclamation that have high wildlife value, with attributes such a diverse and productive understory of vegetation, productive and palatable shrubs, and a high prevalence of native species.
- Establish vegetation with total perennial non-invasive plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.
- Establish vegetation with plant diversity of non-invasive species which is at least half that of pre-disturbance or reference area levels. Quantify diversity of vegetation using a metric that considers only species with at least 3 percent relative plant cover.
- Establish permanent and monumented photo points and vegetation measurement plots or transects; monitor at least annually until plant cover, composition, and diversity standards have been met.
- Observe and maintain a performance standard for reclamation success characterized by the establishment of a self-sustaining, vigorous, diverse, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development.
- Use early and effective reclamation techniques, including interim reclamation to accelerate return of disturbed areas for use by wildlife
- Remove all unnecessary infrastructure during the production phase.
- Reclaim reserve pits as quickly as practical after drilling and ensure that pit contents do not contaminate soil.
- Remediate hydrocarbon spills on disturbed areas prior to reclamation.
- Complete final reclamation activities so that seeding occurs during the first optimal season following plugging and abandonment of oil and gas wells.
- Perform interim reclamation to final reclamation species composition and establishment standards.
- Perform interim reclamation on all disturbed areas not needed for active support of production operations
- Remove and properly dispose of degraded silt fencing and erosion control materials after their utility has expired
- Remove and properly dispose of pit contents where contamination of surface water, groundwater, or soil by pit contents cannot be effectively prevented
- Apply certified weed free mulch and crimp or tacyfy to remain in place to reclaim areas for seed preservation and moisture retention
- Control weeds in areas surrounding reclamation areas in order to reduce weed competition
- Educate employees and contractors about weed issues
- Where possible, fence livestock and/or wildlife out of newly reclaimed areas until reclamation standards have been met and plants are capable of sustaining herbivory
- Conduct necessary reclamation and invasive plant monitoring.
- Census and assess the utilization of the reclaimed areas by the target species
- Maintain pre and post development site inspection records and monitor operations for compliance
- Utilize GIS technologies to assess the extent of disturbance and document the reclamation progression and the footprint of disturbances
- Identify native species for which commercial seed sources are not available. Provide support to contractors for developing cultivation and seed production techniques for needed species
- Conduct reclamation field trials to match seed mixes, soil preparation techniques, and planting methods to local conditions.

General Housekeeping	<p>General</p> <ul style="list-style-type: none"> <li>• Treat/control noxious weeds/plants including Tamarisk</li> <li>• Focus BMPs on critical wildlife seclusion and "crucial habitats"</li> <li>• Continue to Support Operation Game Thief</li> <li>• Continue to support CDOW sportsman's programs</li> <li>• Participate in wildlife seminars and conferences (e.g. AFWA)</li> <li>• Focus Ranch and Property Management (Williams' owned/managed properties) on wildlife resources</li> <li>• Identify conservation easement opportunities on Williams-owned/managed properties</li> <li>• Acquire water rights and irrigate key habitat areas</li> <li>• Restrict and/or manage grazing to benefit wildlife</li> <li>• Fence and restrict activities in locations that provide high value habitat</li> <li>• Construct habitat improvement projects as practical</li> <li>• Enforce policies to protect wildlife (e.g., no poaching, no firearms, no dogs on location, no feeding of wildlife, etc.).</li> <li>• Inventory, monitor and remove obsolete, degraded, or hazardous fencing on Williams owned property</li> <li>• Support research to test the effectiveness of specific Best Management Practices</li> </ul>
Drilling/Completion Operations	<p>Drilling/Completions</p> <ul style="list-style-type: none"> <li>• Continue application of BMPs to prevent wildlife from entering pits including fencing and netting where appropriate</li> <li>• Limit days/hours operations where practical to minimize disturbance and traffic</li> <li>• Promptly report spills that affect wildlife to the CDOW.</li> <li>• Store and stage emergency spill response equipment at strategic locations so that it is available to expedite effective spill response.</li> <li>• Limit parking to already disturbed areas that have not yet been reclaimed</li> <li>• Screen water suction hoses to exclude fish.</li> <li>• Reduce noise by using effective sound dampening devices or techniques (e.g., hospital-grade mufflers, equipment housing, insulation, installation of sound barriers, earthen berms, vegetative buffers, etc.).</li> </ul>
Planning	<p>Planning</p> <ul style="list-style-type: none"> <li>• Conduct wildlife surveys to determine presence of game/non-game species/habitat</li> <li>• Identify and Protect "crucial habitats"</li> <li>• Site access roads, pads and facilities in locations that minimize habitat impacts</li> <li>• Identify private and Federal land seclusion areas where drilling will be voluntarily deferred in critical seasonal habitats</li> <li>• Identify and protect migration corridors</li> <li>• Minimize well pad density to the extent possible</li> <li>• Minimize the number, size and distribution of well pads and locate pads along existing roads where possible.</li> <li>• Cluster well pads in the least environmentally sensitive areas.</li> <li>• Plan pipelines routes ahead of time to avoid field fitting and reduce excessive ROW widths and reclamation.</li> <li>• Adequately size infrastructure and facilities to accommodate both current and future gas production.</li> </ul>

S/U/V: \_\_\_\_\_ **Comment:** \_\_\_\_\_

CA: \_\_\_\_\_ **Date:** \_\_\_\_\_

**Stormwater:**

**Comment:** \_\_\_\_\_

**Staking:**

**On Site Inspection (305):**

**Surface Owner Contact Information:**

Name: \_\_\_\_\_ Address: \_\_\_\_\_

Inspector Name: BROWNING, CHUCK

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:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

**Facility**

Facility ID: 159295 Type: UIC API Number: - Status: AC Insp. Status: AC

Facility ID: 412081 Type: WELL API Number: 045-18424 Status: IJ Insp. Status: AC

**Underground Injection Control**

UIC Violation: \_\_\_\_\_ Maximum Injection Pressure: \_\_\_\_\_

UIC Routine

Inj./Tube: Pressure or inches of Hg \_\_\_\_\_ Previous Test Pressure \_\_\_\_\_ MPP \_\_\_\_\_  
(e.g. 30 psig or -30" Hg) Inj Zone: CZ-CR  
TC: Pressure or inches of Hg \_\_\_\_\_ Previous Test Pressure \_\_\_\_\_ Last MIT: 01/03/2014  
Brhd: Pressure or inches of Hg \_\_\_\_\_ Previous Test Pressure \_\_\_\_\_ AnnMTReq: \_\_\_\_\_

Comment: \_\_\_\_\_

Method of Injection: \_\_\_\_\_

Test Type: Verification of Repairs Tbg psi: 1500 Csg psi: 2031 BH psi: 0

Insp. Status: Pass

Comment: Pressured well to 2013 psi. Hold for 15 min. Final pressure 2100. +69 psi. OK. See Form 21 Doc# 01171570

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Inspector Name: BROWNING, CHUCK

Sample Location: \_\_\_\_\_

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: RANGELAND

Comment: \_\_\_\_\_

1003a. Debris removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Unused or unneeded equipment onsite? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Pit, cellars, rat holes and other bores closed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors removed? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA Date \_\_\_\_\_  
Guy line anchors marked? \_\_\_\_\_ CM \_\_\_\_\_  
CA \_\_\_\_\_ CA 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 \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment: \_\_\_\_\_

Overall Interim Reclamation \_\_\_\_\_ In Process \_\_\_\_\_

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND



Inspector Name: BROWNING, CHUCK

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 \_\_\_\_\_

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
Gravel	Pass	Gravel	Pass	MHSP	Pass	

S/U/V: Satisfactory \_\_\_\_\_

Corrective Date: \_\_\_\_\_

Comment:

CA:

**Pits:** ☐ NO SURFACE INDICATION OF PIT