



STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Fwd: NOAV Document Number 200417500

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: OGCC EnviroScan - DNR <ogcc.enviroscan@state.co.us>

Fri, Nov 21, 2014 at 9:52 AM

Please upload this email and the attached document to:

NOAV 200417500
REM 7058
Location ID: 324634
Pit Facility IDs 112268 and 112269

Thanks
Alex

----- Forwarded message -----

From: **Fischer - DNR, Alex** <alex.fischer@state.co.us>
Date: Fri, Nov 21, 2014 at 9:51 AM
Subject: NOAV Document Number 200417500
To: "Teff, John" <johnt@cmproductionllc.com>
Cc: Matt Lepore <matt.lepore@state.co.us>, Robert Frick - DNR <robert.frick@state.co.us>, Peter Gowen - DNR <peter.gowen@state.co.us>, Greg Deranleau - DNR <greg.deranleau@state.co.us>, Kris Neidel - DNR <kris.neidel@state.co.us>

John,

Attached is a PDF of a Notice of Alleged Violation, Document Number 200417500, issued to CM Productions, LLC. An original copy has been sent via Certified Mail.

Alex

--

Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



P 303.894.2100 x5138 | F 303.894.2109

1120 Lincoln Street, Suite 801, Denver, CO 80203

| alex.fischer@state.co.us www.colorado.gov/cogcc

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



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 **CM Production Cover Letter NOAV 200417500 20141121 ajf.pdf**
1349K



COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

November 21, 2014

Via Certified Mail 7014 0510 0002 0093 8916

CM Productions, LLC
Attn: John Teff
390 Union Boulevard, Suite 620
Lakewood, CO 80228

Re: Margaret Spaulding Location
Location ID: 324634
Pit Facility ID: 112268 (Pit 4)
Pit Facility ID: 112269 (Pit 5)
Location ID: 324634
SW¼ SE¼, Section 28, Township 9 North, Range 81 West, Jackson County, CO

Dear Mr. Teff,

The Colorado Oil and Gas Conservation Commission (COGCC) is issuing a Notice of Alleged Violation (NOAV) (Document Number 200417500) to CM Productions, LLC (Operator Number 10352) for failure to comply with a November 1, 2014 compliance date specified in Order No. 1V-412, as extended by letter dated June 25, 2014 at the Margaret Spaulding Location ID: 324634, a violation of Section 34-60-121(1) C.R.S. (Violation of Commission Order).

Order No. 1V-412 required the operator of Location ID: 324634 to decommission the former water treatment pits (Pit Facility ID: 112268 [Pit 4], and Pit Facility ID: 112269 [Pit 5]) to Table 910-1 standards pursuant to an approved Form 27 by July 1, 2014. Upon request of the operator (Document Number 2141208), this deadline was extended by the Director (Document Number 2141502) to November 1, 2014 for Pit Facility IDs 112268, 112269 and to July 1, 2015 for Pits Facility IDs 112265, 112266, and 112267. The NOAV is written for failure to complete the decommissioning Pit Facility IDs 112268 and 112269 to Table 910-1 standards by the November 1, 2014 deadline.

On November 7, 2014, COGCC conducted a field inspection (Document Number 669300157) which documented that Pit Facility IDs 112268 and 112269 were not closed and appeared to have residual hydrocarbon staining and oil in the pits. This follows an October 2014 report (Document Number 2142388) submitted from Olsson and Associates to the COGCC, reporting a soil sample collected from Pit Facility ID 112269 with total petroleum hydrocarbons (TPH) above Table 910-1.

P 303.894.2100 F 303.894.2109 www.colorado.gov/cogcc

Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,
James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk
John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



Should you have any questions, please contact me at 303-894-2100 extension 5138.

Sincerely,



Alex Fischer, P.G.
Environmental Supervisor-Western Colorado

Cc: Matt Lepore, COGCC Director
Bob Frick, COGCC Hearings Manager
Peter Gowen, COGCC Enforcement Officer
Greg Deranleau, COGCC Environmental Manager
Kris Neidel, COGCC NW Field Inspector

Attachment 1 NOAV, Document Number 200417500
Attachment 2 Request for Compliance Extension - Order No. 1V-412, Document Number 2141208
Attachment 3 June 25, 2014 COGCC Director letter granting time extension, Document Number 2141502
Attachment 4 November 7, 2014 Field Inspection, Document Number 669300157

Pit Facility 112268
Pit Facility 112269
Location ID: 324634
SWSE Sec. 28 T9N R81W, Jackson County, Colorado



*** NOTICE OF ALLEGED VIOLATION ***

OGCC Operator Number: 10352
Name of Operator: CM PRODUCTION LLC
Address: 390 UNION BLVD SUITE 620 ATTN: JOHN TEFF
City: LAKEWOOD State: CO Zip: 80228
Company Representative: JOHN TEFF

Date Notice Issued:
11/21/2014

Well Name: Well Number: Facility Number: 324634
Location (QtrQtr, Sec, Twp, Rng, Meridian): SWSE 28 9N 81W 6 County: JACKSON
API Number: 05 Lease Number:

COGCC Representative: Fischer Alex Phone Number: 303 894-2100

THE FOLLOWING ALLEGED VIOLATION WAS FOUND BY THE COGCC REPRESENTATIVE FOR THE SITE LISTED

Date of Alleged Violation: 11/7/2014 Approximate Time of Violation: 12:00PM
Description of Alleged Violation:
Order No. 1V-412 required the operator of the Margaret Spaulding Location (Location No. 324634) to decommission the former water treatment pits to Table 910-1 standards pursuant to an approved Form 27 by July 1, 2014. Upon request by the operator, this July 1, 2014 deadline was extended in a June 25, 2014 letter from the Director, to November 1, 2014 for Pit Facility IDs 112268 and 112269 and to July 1, 2015 for Pits Facility IDs 112265, 112266, and 112267. Operator has failed to decommission Pit Facility IDs 112268 and 112269 by November 1, 2014 as required by Order 1V-412.

Act, Order, Regulation, Permit Conditions Cited:
Section 34-60-121(1) C.R.S. (Violation of Commission Order); Order Nos. 1V-412 and 1V-413.

Abatement or Corrective Action Required to be Performed by Operator:
Immediately close the pits as follows:
Submit a Form 27 Site Investigation and Remediation Workplan within 10 days of receipt of this NOAV for closure of pits (Pit Facility 112268 and Pit Facility 112269).
Implement Remedial activities within 10 days of approval of the Form 27 which may include removal of impacted material by excavation and disposal at an approved facility.
Abatement or Corrective Action to be Completed by (date): 11/1/2014
* Proper and timely abatement does not necessarily preclude the assessment of penalties and an Order Finding Violation.

TO BE COMPLETED BY OPERATOR - When alleged violation is corrected, sign this notice and return to above address:
Company Representative Name: Title:
Signature: Date:
Company Comments:

*** THIS NOTICE CONSTITUTES A SEPARATE NOTICE OF ALLEGED VIOLATION FOR EACH VIOLATION LISTED ***

WARNING
Abatement and reporting time frames for Notices of Alleged Violation begin upon receipt of the Notice or five days after the date it is mailed, whichever is earlier. Each violation must be abated within the prescribed time upon receipt of this Notice, reported to the Colorado Oil and Gas Conservation Commission at the address shown above, and postmarked no later than the next business day after the prescribed time for abatement. Should abatement or corrective action fail to occur, the Director may make application to the Commission for an Order Finding Violation. Proper and timely abatement does not necessarily preclude the assessment of penalties and an Order Finding Violation.

PENALTY PROPOSED BY THE DIRECTOR PER RULE 523
The Director may propose a penalty as listed in the table below, not to exceed a maximum of \$1,000.00 per day per violation. Such proposed penalty amount will be limited to \$10,000.00 per violation if the violation does not result in significant waste of oil and gas resources, damage to correlative rights, or a significant adverse impact on public health, safety, or welfare. Such proposed penalty amount may be increased if aggravating factors indicate the violation: was intentional or reckless; had, or threatened to have, a significant negative impact on public health, safety, or welfare; resulted in significant loss or damage to public or private property; involved recalcitrance or recidivism upon the part of the violator; involved intentional false reporting or record keeping; resulted in economic benefit to the violator. Such proposed penalty amount may be decreased if mitigating factors indicate the violator: self-reported; promptly, effectively and prudently responded to the violation; cooperated with the Commission or other agencies with respect to the violation; could not reasonably control, or be responsible for, the cause of the violation; made a good faith effort to comply with applicable requirements prior to the Commission learning of the violation; had any economic benefit reduced or eliminated due to the cost of correcting the violation; has demonstrated a history of compliance with Commission rules, regulations and orders. The Commission has final authority over the penalty amount assessed.
the Commission or other agencies with respect to the violation; could not reasonably control, or be responsible for, the cause of the violation; made a good faith effort to comply with applicable requirements prior to the Commission learning of the violation; had any economic benefit reduced or eliminated due to the cost of correcting the violation; has demonstrated a history of compliance with Commission rules, regulations, and orders. The

BASE FINE \$250.00 PER DAY PER VIOLATION: RULES 210, 307, 311, 312, 313, 314A, 315, 403, 405, 803, 804
BASE FINE \$500.00 PER DAY PER VIOLATION: RULES 205, 206, 207, 208, 302, 308, 309, 310, 316A, 321, 322, 328, 329, 330, 331, 332, 401
BASE FINE \$750.00 PER DAY PER VIOLATION: RULES 605, 606A, 606B, 607
BASE FINE \$1,000.00 PER DAY PER VIOLATION: RULES 209, 301, 303, 305, 306, 316B, 317, 317A, 318, 319, 320, 323, 324, 325, 326, 327, 333, 404, 602, 603, 604, 703, 704, 705, 706, 707, 708, 709, 711, 802, 801, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 1002, 1003, 1004, 1101, 1102, 1103

In accordance with Rule 523.a.(4), fines for violations for which no base fine is listed shall be determined by the Commission at its discretion.
Signature of COGCC Representative: [Signature] Date: 11/21/14 Time: 08:42
Resolution Approved by: _____ Date: _____



June 5, 2014

Director Matt Lepore
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street
Denver, Colorado 80203

**RE: Request for Compliance Date Extension
CM Production LLC ("CM"), Lone Pine Oil Field (Location #324634, 'Nonfacility' #420409,
Remediation # 7058) ("Field") Jackson County, Colorado**

Dear Director Lepore:

This letter summarizes information in CM's letter and Form 27 to COGCC dated May 23, 2014 ("Submission"). CM seeks an extension under Administrative Order on Consent IV-413 ("AOC") of the deadlines to complete decommissioning of the five produced water treatment pits at the Field and for treatment of the soil stockpile.

I. Basis for Extensions

Paragraph 9 of the AOC allows the Director to extend compliance dates for "good cause." Such cause exists here for reasons detailed in the Submission, including:

1. CM Production has made significant progress in addressing the environmental impacts and necessary operational and maintenance issues in the eleven months that it has operated the Field. Completed benchmarks are detailed at pp. 1-2 of the Submission.
2. CM Production has timely honored its commitments in the AOC. The impacted soils in the stockpiles were treated in accordance with an approved work plan shortly after CM acquired the field in June 2013. The nature of the compounds of concern, administrative and weather delays, and other factors beyond CM Production's control prevented achievement of Table 910-1 standards within the expected time frame, which has affected pit decommissioning timing.
3. CM Production honored its commitments under CDPHE COC IC-130624-1 to cease any produced water discharge on October 31, 2013. The field has been shut-in since last Fall, but CM has continued to take preventive measures to improve the Field.
4. Groundwater sample results from the six groundwater monitoring wells at the Field have not shown concentrations of petroleum hydrocarbon constituents above the COGCC Table 910-1 concentration levels. Allowing additional time to complete this work will present no threat to state waters or the surrounding environment.
5. CM has and will continue to work with the surface owner, the Silver Spur Ranch, to make sure that all assessment and remediation work is acceptable to the ranch, and that the remedy progress is communicated to the ranch management.

II. Extended Compliance Dates

Paragraph 4 of the AOC contains a current compliance date of July 1, 2014 to decommission the remaining produced water treatment pits. Paragraph 2 states that stockpiled soils shall be "treated or disposed of by September 1, 2013, pursuant to an approved Form 27." CM is requesting an extension to the following compliance dates:

4690 Table Mountain Drive, Suite 200 TEL 303.237.2072
Golden, CO 80403 FAX 303.237.2659 www.oaconsulting.com

A. Pits

- November 1, 2014: The two western produced water pits (Pit #112268 and 112269) will be decommissioned by this time. These pits are closest to the Spring Gulch drainage and will be afforded first priority. Although decommissioning will be completed by November 1, 2014, final reclamation will be performed in accordance with the COGCC rules and will likely extend into the spring of 2015 due to the short growing season.
- July 1, 2015: Pits #112265, 112266, and 112267 on the east side of the site access road will be decommissioned by this date, with reclamation to follow as noted above.

B. Stockpile

- July 1, 2015: CM complied with Paragraph 2 by completing soil treatment by September 1, 2013 under an approved Form 27. An updated Form 27 is included in the Submission, describing CM's plans for additional treatment of the impacted soil stockpile towards meeting Table 910-1 concentration levels for total petroleum hydrocarbons of 500 mg/kg. Pursuant to COGCC Rule 907, CM will land treat these soils in order to meet the Table 910-1 concentration levels. Treatment shall be completed by July 1, 2015 pursuant to the updated Form 27.

C. General

- As long as reasonable progress is being made, CM requests that flexibility be maintained going forward in the event that additional time is needed to meet the Table 910-1 concentrations or in the event that unexpected conditions are encountered that make it necessary to request another extension.

III. Specific AOC Modifications

- The deadline under Paragraph 2 is extended to July 1, 2015.
- The deadline in Paragraph 5 is extended to November 1, 2014 for Pits # 112268 and 112269, and to July 1, 2015 for Pits # 112265, 112266, and 112267.
- The suspension of the penalty under Paragraph 7 of the AOC is extended until July 1, 2015, and shall be fully vacated if the corrective actions required pursuant to paragraphs 2 through 6 of the AOC have been satisfactorily and timely completed by this date.

Thank you for your consideration of this extension.

Sincerely,

Olsson Associates



James W. Hix
Senior Geologist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

June 25, 2014

John Teff, Business Manager
CM Production, LLC
600 17th Street, Suite 2800 South
Denver, Colorado 80202

Re: Request for Compliance Date Extension - Order No. 1V-412
CM Production LLC ("CM")
Margaret Spaulding Location (Location #324634)
Jackson County

Dear Mr. Teff,

The Colorado Oil and Gas Conservation Commission (COGCC) is in receipt of the Request for Compliance Date Extension from Olsson Associates ("Extension Request") dated June 5, 2014, submitted on behalf of CM Production LLC ("CM"). The Extension Request seeks an extension under Administrative Order on Consent IV-413 ("AOC") of deadlines to complete decommissioning of the five produced water treatment pits and treatment of an oil-stained soil stockpile at the Margaret Spaulding Location (Location No. 324634) in Jackson County, Colorado.

Order 1V-413 is a Stipulated Order, in which CM agreed to be liable for the compliance plan of Order 1V-412 between the Commission and the prior operator of the location. The Director may extend the deadlines in the Order IV-412 compliance plan for good cause.

Based on the Extension Request, CM's Form 27 (received by the Commission on May 23, 2014 with its attached work plan), and staff's conditional approval of CM's Form 27 on June 5, 2014 (Document No. 1949215), I find good cause exists for extending the deadlines as follows:

1. The deadline under Paragraph 2, page 5 of Order 1V-412 is extended to July 1, 2015.

303.894.2100 F 303.894.2109 www.colorado.gov/cogcc

Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,
James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk

John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



Mr. John Teff
June 25, 2014
Page 2

2. The deadline in Paragraph 4, page 5 of Order 1V-412 is extended to November 1, 2014 for Pit Facility IDs 112268 and 112269.
3. The deadline in Paragraph 4, page 5 of Order 1V-412 is extended to July 1, 2015 for Pits Facility IDs 112265, 112266, and 112267.
4. The suspension of the penalty under Paragraph 7, page 5 of Order 1V-412 is extended until July 1, 2015. If the corrective actions required pursuant to paragraphs 2 through 6 of page 5 of Order 1V-412 are satisfactorily and timely completed, the penalty will be vacated. If the required corrective actions are not satisfactorily and timely completed, the penalty shall be due in full 30 calendar days following written notice from the Director.

Groundwater sampling will continue as specified by an approved Form 27.

All other provisions of Order 1V-412 remain in full force and effect as approved.

Sincerely,



Matthew Lepore
Director

Cc: Roger Freeman (by email)
James Hicks (by email)

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



| | | | |
|----|----|----|----|
| DE | ET | OE | ES |
|----|----|----|----|

Inspection Date:
11/07/2014

Document Number:
669300157

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

| | | | | |
|---------------------|-------------|--------|-----------------|--------------------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name: | On-Site Inspection |
| | 324634 | 324634 | NEIDEL, KRIS | <input type="checkbox"/> |
| | | | 2A Doc Num: | |

Operator Information:

OGCC Operator Number: 10352

Name of Operator: CM PRODUCTION LLC

Address: 390 UNION BLVD SUITE 620

City: LAKEWOOD State: CO Zip: 80228

- 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 |
|---------------|-------|---------------------------|---------|
| Fischer, Alex | | alex.fischer@state.co.us | |
| Teff, John | | johnt@cmproductionllc.com | |

Compliance Summary:

QtrQtr: SWSE Sec: 28 Twp: 9N Range: 81W

| Insp. Date | Doc Num | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 10/21/2013 | 669300772 | | | SATISFACTORY | | | No |
| 05/30/2012 | 662300564 | | | ACTION REQUIRED | | | No |
| 05/01/2012 | 662300454 | | | SATISFACTORY | | | No |
| 04/11/2012 | 662300401 | | | SATISFACTORY | | | No |
| 04/02/2012 | 662300395 | | | SATISFACTORY | | | No |
| 01/11/2012 | 667100002 | | | ACTION REQUIRED | | | No |
| 01/03/2012 | 662300113 | | | ALLEGED VIOLATION | | | Yes |

Inspector Comment:

Environmental Staff on location to document status of ponds (see attached pictures for details): Pond 1 had some oil, was netted, had some water. Pond 2 had some residual oil, had some water (below working waterline). Pond 3 Had residual oil in water and in pond bottom, pond had water (well below working water level). Pond 4 had very small amount of water, pond bottom had residual oil, pond was practicably dry. Pond 5 had very small amount of water, pond bottom had residual oil, pond was practicably dry. It appeared that upgrades to field have continued; spoil pile from "Holding Pond" has been being turned to some extent (see pics attached), electric has been installed to some wells including the injection well, fencing has been updated, some tanks have been added to tank battery. Overall status of inspection will remain "Action Required" until closure of ponds. No wells producing at field.

Related Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|---------|------------------------------|-------------|
| 112265 | PIT | AC | 09/23/1999 | | - | SPAULDING BATTERY (15 WELLS) | AC |
| 112266 | PIT | AC | 09/23/1999 | | - | SPAULDING BATTERY (15 WELLS) | AC |
| 112267 | PIT | AC | 09/23/1999 | | - | SPAULDING BATTERY (15 WELLS) | AC |

Inspector Name: NEIDEL, KRIS

| | | | | | | | | |
|--------|--------------|----|------------|------|-----------|--------------------------------------|----|-------------------------------------|
| 112268 | PIT | AC | 09/23/1999 | | - | SPAULDING BATTERY (15 WELLS) | AC | <input type="checkbox"/> |
| 112269 | PIT | AC | 09/23/1999 | | - | SPAULDING BATTERY (15 WELLS) | AC | <input type="checkbox"/> |
| 115241 | PIT | AC | 09/23/1999 | | - | SPAULDING "B" 1-15 | AC | <input type="checkbox"/> |
| 150081 | UIC DISPOSAL | AC | 01/15/1985 | | - | SPAULDING 4-B | AC | <input type="checkbox"/> |
| 212138 | WELL | PR | 02/01/2011 | OW | 057-06031 | MARGARET SPAULDING 4 | PR | <input type="checkbox"/> |
| 212154 | WELL | SI | 06/15/1984 | DSPW | 057-06047 | MARGARET SPAULDING 4-B | SI | <input type="checkbox"/> |
| 212215 | WELL | PR | 07/19/1974 | OW | 057-06108 | MARGARET SPAULDING 14 | PR | <input type="checkbox"/> |
| 420409 | NONFACILITY | | 11/18/2010 | | - | LONE PINE TREATMENT PITS | EI | <input checked="" type="checkbox"/> |
| 427281 | TANK BATTERY | AC | 01/10/2012 | | - | M. SPAULDING CENTRALIZED TANK BATT 1 | EI | <input checked="" type="checkbox"/> |

Equipment: Location Inventory

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

Location

Emergency Contact Number (S/AV): _____ Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

| Type | Area | Volume | Corrective action | CA Date |
|--|------|--------|-------------------|---------|
| <input type="checkbox"/> Multiple Spills and Releases? | | | | |

Venting:

| Yes/No | Comment |
|--------|---------|
| | |

Flaring:

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|------|------------------------------|---------|-------------------|---------|
| | | | | |

Predrill

Location ID: 324634

Site Preparation:

Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/AV: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:

S/AV: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

S/AV: _____ **Comment:** _____

CA: _____ **Date:** _____

Stormwater:

Comment: _____

Staking:

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:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Facility

Facility ID: 420409 Type: NONFACILIT API Number: - Status: _____ Insp. Status: EI

Facility ID: 427281 Type: TANK API Number: - Status: AC Insp. Status: EI

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: _____ Lat _____ Long _____
DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters: _____

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: _____
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? _____

Inspector Name: NEIDEL, KRIS

Comment: _____

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 _____

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| | | | | | | |

S/A/V: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

| Document Num | Description | URL |
|--------------|------------------------------|---|
| 669300158 | holding ponds and spoil pile | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3477945 |

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC’s penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)



Holding Pond



Pond #1



Pond #2



Pond #3



Pond #3



Pond #4



Pond #4



Pond #5



Stock pile from Holding Pond



Stock pile from Holding Pond

CM employees told Environmental Staff that they were rotating soil from main pile on the left to the pile on the right to expose soil to sun and wind.