

**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:
04/09/2015Document Number:
667100465

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	427295	325795	ROY, CATHERINE	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 10000Name of Operator: BP AMERICA PRODUCTION COMPANYAddress: 501 WESTLAKE PARK BLVDCity: HOUSTON State: TX Zip: 77079

- ☐ 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
		SanJuanCOGCC@bp.com	All Inspections
Beebe, Sabre		Sabre.Beebe@bp.com	All Inspections

Compliance Summary:QtrQtr: SWSE Sec: 19 Twp: 34N Range: 6W**Inspector Comment:**

This is an interim reclamation inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
215391	WELL	PR	07/27/1988	GW	067-06996	BOONE 1	PR	<input checked="" type="checkbox"/>
427295	WELL	XX	01/15/2012	LO	067-09875	Boone GU 2	XX	<input type="checkbox"/>
438739	SPILL OR RELEASE	AC	09/02/2014		-	SPILL/RELEASE POINT	AC	<input type="checkbox"/>

Equipment:Location Inventory

Special Purpose Pits: <u> </u>	Drilling Pits: <u>1</u>	Wells: <u>2</u>	Production Pits: <u> </u>
Condensate Tanks: <u> </u>	Water Tanks: <u>1</u>	Separators: <u>4</u>	Electric Motors: <u>3</u>
Gas or Diesel Motors: <u>1</u>	Cavity Pumps: <u>2</u>	LACT Unit: <u> </u>	Pump Jacks: <u>2</u>
Electric Generators: <u>1</u>	Gas Pipeline: <u>1</u>	Oil Pipeline: <u> </u>	Water Pipeline: <u>1</u>
Gas Compressors: <u>1</u>	VOC Combustor: <u> </u>	Oil Tanks: <u> </u>	Dehydrator Units: <u> </u>
Multi-Well Pits: <u> </u>	Pigging Station: <u> </u>	Flare: <u> </u>	Fuel Tanks: <u> </u>

Location

Emergency Contact Number (S/A/V): 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: 427295

Site Preparation:

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

S/A/V: _____

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

Form 2A COAs:

Group	User	Comment	Date
OGLA	kubeczkod	<p>SITE SPECIFIC COAs:</p> <p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.</p> <p>Any pit constructed to hold liquids, must be lined or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling.</p> <p>Operator must ensure 110 percent secondary containment for any volume of fluids (excluding freshwater) 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.</p> <p>Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit 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.</p> <p>The moisture content of any drill 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, the drill cuttings must also meet the applicable standards of table 910-1, with the following exceptions where applicable: COGCC and CDPHE have decided that operators do not need to request variances from CDPHE for instances where pit contents do not meet the Table 910-1 values for pH, electrical conductivity (EC), or sodium adsorption ration (SAR). However, operators shall attempt, where practicable, to meet the pH, EC, and SAR values, but must ensure that the remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with the 1000 Series Rules. The backfill and replaced soil must meet Table 910-1 pH, EC, and SAR values, with consideration given to background levels in native soils.</p>	12/12/2011

S/A/V: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

BMP Type	Comment
Storm Water/Erosion Control	Covered in the field wide Storm Water Management Plan. Supplemental site specific SWMP is attached.
Wildlife	Covered in the BP San Juan Basin Colorado Wildlife Mitigation Plan (WMP) dated March 2011

Construction

1. Drilling Pad Construction BMPs: 2, 14, 24 & 40
 - ? Implement structural best management practices (i.e. wattles) where shown on maps prior to ground disturbing activities.
 - ? Establish sub-base to route surface water as sheet flow off the north end of location.
 - ? Establish base lift gravel to accommodate level drilling operations and stabilize pad surface.
 - ? Store Top soil as shown here on. Retain with SCL as indicated.
2. Drilling and Completion Operations BMPs: Spill and Contaminated Soil Management
 - ? Fuel, Mud Products, drill cutting spoils, Trailer Septic Tanks, etc. that may contribute to storm water run-off shall be maintained within the graveled well pad area and contained in proper containers and/or sheltered from exposure.
 - ? Any equipment maintenance shall be avoided during drilling and completion—in the event maintenance must occur, it shall be conducted within the graveled pad area, fluids shall be captured within spill proof containers, and absorbent mats shall be utilized beneath maintenance operations.
 - ? Contaminated soil should be collected and disposed of at an appropriate soil farm or similar facility.
3. Interim Pad Reclaim BMPs: 2, 24, & 34
 - ? Reclaim north, west, and east cut/fill slopes to 3:1 or less.
 - ? Trench and bury remaining drill cuttings when material is 95-100% dry.
 - ? Spread top-soil over fill slopes & blend to existing grade areas where sloping meets predisturbance grade.
 - ? Repair, replace, or install pad wattles if necessary or as shown.
4. Re-seeding & BMP Removal
 - ? Re-seed as soon as possible following reclamation of pad-provided season and weather permits and cover with 2 tons/acre of weed free straw mulch. Tackify or crimp the mulch to the exposed soil surfaces. Swale at southwest corner shall be mulched with a bonded fiber matrix.
 - o Cut/Fill Slopes & Top-Soil Storage Area.
 - ? Seed mix should implement an annual cover or tritcale.
 - o Seed Mixture = G-P
 - ? Upon 70% Re-Vegetation across site, remove wattles and any other temporary erosion and sediment control BMP.

S/A/V: _____ 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: 215391 Type: WELL API Number: 067-06996 Status: PR Insp. Status: PR

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: RANGELAND

Comment: Revegetation is progressing within the interim reclamation area. Several musk thistle rosettes were observed scattered throughout the interim reclamation area. Musk thistle is a state and County listed noxious weed. Weeds need to be controlled at the appropriate time but no later than seedhead maturity in 2015.

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? In Production areas stabilized ? In

Inspector Name: ROY, CATHERINE

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? _____ In _____

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 _____ In _____

1003 f. Weeds Noxious weeds? _____ F _____

Comment: _____

Overall Interim Reclamation _____ Fail _____

Final Reclamation/ Abandoned Location:

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

Final Land Use: IMPROVED PASTURE, OTHER _____

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: **05/31/2015**

Comment: **Several erosional channels are forming within the northeastern portion of the project area. See attached photos for additional detail.**

CA: **Erosional channels need to be repaired and stabilized and stormwater run on controlled to prevent new channel formation.**

Pits: ☒ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Location does not meet reclamation regulations. Stormwater erosion needs to be controlled within the project area by May 31, 2015. Weeds need to be controlled before seedhead maturity in 2015.	RoyC	04/24/2015

Attached Documents

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

Document Num	Description	URL
667100467	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3596733

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.)