

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:
08/26/2015

Document Number:
674900748

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	7999		Hughes, Jim	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	<u>41700</u>
Name of Operator:	<u>HUGHES* WILLIAM E</u>
Address:	<u>406 BOTULPH LN STE 1</u>
City:	<u>SANTA FE</u> State: <u>NM</u> Zip: <u>87505</u>

- 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
Deranleau, Greg		greg.deranleau@state.co.us	
Sacks, Rudolph	505-988-8801	rsacks@santafetaxlawyer.com	
Hicks, Randall	505-266-5004	r@rthicksconsult.com	
Haarmann, Tim	970-264-9268	thaarmann@bandedpeaksranch.com	
Parker, Andrew	970-570-9535	andrew@rthicksconsult.com	
Fischer, Alex		alex.fischer@state.co.us	

Compliance Summary:

QtrQtr: _____ Sec: _____ Twp: _____ Range: _____

Inspector Comment:

On August 26, 2015 COGCC Environmental Group West Supervisor Alex Fischer and SW EPS Jim Hughes conducted an environmental field inspection of the Hughes Gramps Oil Field addressing various aspects of remediation project #73. Specifically, this inspection focused on the remediation cell area, the monitoring well network, and the pit complex. Mr. Tim Haarmann (Banded Peaks Ranch manager) and Mr. Travis Brooks were present during portions of this field inspection. This inspection is a follow up to R.T. Hicks Consultants, Inc. (R.T. Hicks) June 4, 2015 "Gramps Field Closure Report" (Document #2314748). The inspection also provides The Colorado Oil and Gas Conservation Commission (COGCC) review comments of R.T. Hicks response to the request for further information regarding the Gramps Oil Field Closure Report. An amended Form 27 Site Investigation and Remediation Workplan shall be submitted to COGCC by November 11, 2015.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
7999	LEASE	PA	11/06/1998		-	GRAMPS OIL FIELD	EI <input checked="" type="checkbox"/>

Equipment:

Location Inventory

Location

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

Comment: _____

Corrective Action: _____

Spills: _____

Inspector Name: Hughes, Jim

Type	Area	Volume	Corrective action	CA Date
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Multiple Spills and Releases?

Venting:	
Yes/No	Comment

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 7999

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: 7999 Type: LEASE API Number: - Status: PA Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: OIL Description: _____ Estimated Spill Volume: _____

Comment: Submit a supplemental Form 27 addressing the items outlined in the COGCC's February 17, 2015 letter, as well as the sampling of MW-6 and abandonment of the monitoring wells listed in the attached inspection summary.

Corrective Action: Submit a supplemental Form 27 to COGCC SW EPS. Date: 11/11/2015

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

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

Field Parameters:

Sample Location: _____ Other _____

Sample	Sample Type: <u>SOIL COMPOSITE</u>				
Time: <u>08/26/2015 14:25</u>	(MM/dd/yyyy hh:mm)	GPS: Lat <u>37.068950</u>	Long <u>-106.689670</u>		
BTEX: <u>YES</u>	TPH: <u>YES</u>	Anion: _____	Captions: _____	General Chemistry: _____	
Dissolved Methane: _____	Composition: _____	Stable Isotopes: _____	8260: _____		
8270: _____	RCRA Metals: _____	910-Metals: _____	PAH: _____		
Other: <u>Sample ID 201508261425</u>					
Comment: Analytical results are included in this report as an attachment.					

Lab:

Lab Name _____
 ESC _____

Waste Management:

Type	Management	Condition	Comment	GPS (Lat)	(Long)
Oily Soil	Land Treatment	Inadequate			

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? _____

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

Inspector Name: Hughes, Jim

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

COGCC Comments

Comment	User	Date
Please see attached Inspection Summary. An amended Form 27 Site Investigation and Remediation Workplan shall be submitted to COGCC by November 11, 2015.	hughesj	09/11/2015

Attached Documents

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

Document Num	Description	URL
674900751	Photographs of Site Inspection.	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3680773
674900763	Analytical Report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3680774
674900765	Inspection Summary	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3680775

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.)