

**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:

09/11/2015

Document Number:

680600170

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>214752</u>	<u>325426</u>	<u>ROY, CATHERINE</u>	<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:	SENW	Sec:	19	Twp:	34N	Range:	6W
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
01/07/2013	669400364	PR	PR	SATISFACTORY	I		No
04/11/2008	200130280	ES	PR	SATISFACTORY			No
05/16/2006	200093275	PR	PR	SATISFACTORY		Pass	No
06/04/2004	200057877	PR	PR	SATISFACTORY		Pass	No
05/06/2003	200040981	PR	PR	SATISFACTORY		Pass	No
10/17/2001	200022917	PR	PR	SATISFACTORY		Pass	No
06/26/2000	200007588	PR	PR	SATISFACTORY		Pass	No
05/11/1999	500147842	BH	PR			Pass	No
02/21/1997	500147844	PR	PR			Pass	No
08/11/1995	500147841	PR	PR				No
08/11/1995	500147843	PR	PR				No

Inspector Comment:

This is a followup inspection for inspection number 667100474 conducted on April 9, 2015. Drilling operations were being conducted on the location at the time of the inspection.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
214752	WELL	PR	12/21/1987	GW	067-06356	WRIGHT 01-19 1	PR	<input checked="" type="checkbox"/>
428403	WELL	XX	03/30/2012	LO	067-09890	Wright GU 01-19 2	XX	<input checked="" type="checkbox"/>

Equipment:Location Inventory

Inspector Name: ROY, CATHERINE

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

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: 214752

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 COA:</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 that will be reused/recycled must also meet the applicable standards of table 910-1. However, if the drill cuttings are to remain onsite, the following exceptions to meeting the 910-1 standards will be 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>	03/26/2012

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

CA: _____ **Date:** _____

Wildlife BMPs:

BMP Type	Comment
Interim Reclamation	? Remove SF and replace with SCLs. ? Install ECB. ? Reclaim cut slopes to 3:1 or less. Reclaim temporary fills out of wetland. See USACOE permit for additional conditions. ? Dispose of drill cuttings in accordance with COGCC 900 series rules. ? Spread topsoil over fill slopes & blend to existing grade areas where sloping meets pre-disturbance grade. ? Repair, replace, or install pad wattles if necessary or as shown.
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.
Drilling/Completion Operations	BMPs: Spill and Contaminated Soil Management ? Fuel, mud products, drill cutting spoils, trailer septic tanks, etc. that may contribute to storm water runoff shall be maintained within the graveled wellpad 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.
Construction	? Install silt fence and SCLs as shown on map to act as a delineator of wetland so that no spoils enter wetland beyond permitted temporary fills. See USACOE permit for additional conditions. ? Establish subbase to route surface water as sheet flow to the south end of location. ? Establish base lift gravel to accommodate level drilling operations and stabilize pad surface. ? Store topsoil on south end of pad as shown on map.

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

CA: _____ **Date:** _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present

S/A/V: ACTION
REQUIRED

Corrective Action: **Stormwater BMPs are needed to stabilize areas devoid of vegetation and soil stockpiles.** Date: **10/02/2015**

Comments: Erosion BMPs: **Approx. 30 feet vegetation has been removed along both sides of the access road as well as an approximately 50 foot pipeline right of way, and an approximately 100 x 200-foot staging area. Additionally there is an approx. 10 foot tall and 20 foot long soil stockpile outside of the project area. There are no stormwater BMPs in these areas devoid of vegetation. A culvert is full of sediment and apparent stormwater channels and sediment flows were observed. See attached photos.**

Other BMPs: _____

Comment: _____

Staking:**On Site Inspection (305):****Surface Owner Contact Information:**

Name: _____ Address: _____

Inspector Name: ROY, CATHERINE

Phone Number: _____	Cell Phone: _____	
<u>Operator Rep. Contact Information:</u>		
Landman Name: _____	Phone Number: _____	
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____	
Request LGD Attendance: _____		
<u>LGD Contact Information:</u>		
Name: _____	Phone Number: _____	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>		
<u>Summary of Operator Response to Landowner Issues:</u>		
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>		

Facility

Facility ID: 214752	Type: WELL	API Number: 067-06356	Status: PR	Insp. Status: PR
Facility ID: 428403	Type: WELL	API Number: 067-09890	Status: XX	Insp. Status: XX

Environmental

Spills/Releases:

Type of Spill: _____	Description: _____	Estimated Spill Volume: _____
Comment: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
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 _____
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Field Parameters:

Sample Location: <div style="border: 1px solid black; height: 20px; width: 100%;"></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: RANGELAND	
Comment: <div style="border: 1px solid black; padding: 5px; color: red;">Poor revegetation within the western cut-slope. Areas of recent vegetation removal along access road, staging, and pipeline corridor need to be seeded no later than fall 2015 as it appears that this will be the first favorable season after rig demobilization. See attached photos.</div>	

1003a.	Debris removed? _____ In _____ CM _____	CA _____	CA Date _____
	Waste Material Onsite? _____ CM _____	CA _____	CA Date _____
	Unused or unneeded equipment onsite? _____ In _____ 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 _____
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Non-Cropland

Top soil replaced _____	Recontoured _____	80% Revegetation _____
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1003 f. Weeds Noxious weeds? _____

Comment:

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

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

Final Land Use: RANGELAND, RESIDENTIAL

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:

Inspector Name: ROY, CATHERINE

Corrective Action: 				Date 		
Overall Final Reclamation 		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		
Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
S/A/V: ACTION REQUIRED Corrective Date: 10/02/2015						
Comment: Straw wattle placed in erosional channel where stormwater flows exit the southern edge of the well pad is not sufficient to de-energize stormwater flows in this area.						
CA: Additional stormwater BMPs are needed where concentrated flows exit the southern portion of the well pad.						
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						
COGCC Comments						
Comment				User	Date	
Location does not meet reclamation regulations. Areas where vegetation was recently removed are not stabilized as well as a large soil stockpile. Additionally straw wattle in erosional channel in southern portion of well pad is not sufficient to de-energize stormwater flows. Stormwater erosion needs to be controlled by October 2, 2015. Areas where vegetation was recently removed and western cut-slope need seeding by fall 2015.				RoyC	09/25/2015	
Attached Documents						
You can go to COGCC Images (https://cogcc.state.co.us/weblink/) and search by document number:						
Document Num	Description	URL				
680600174	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3687478				

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.)