

**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:  
10/30/2015Document Number:  
682400034

Overall Inspection:

**ACTION REQUIRED****FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	431161	431161	Binschus, Chris	<input type="checkbox"/>	

**Operator Information:**OGCC Operator Number: 47120Name of Operator: KERR MCGEE OIL & GAS ONSHORE LPAddress: P O BOX 173779City: DENVER State: CO Zip: 80217-

- ☐ 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
Ready, Luke		luke.reddy@anadarko.com	
		rscCOGCCinspections@anadarko.com	

**Compliance Summary:**QtrQtr: NWNW Sec: 15 Twp: 1N Range: 68W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
01/16/2015	673801680			SATISFACTORY			No

**Inspector Comment:**

This is an inspection resulting from a complaint (Doc. #200437789) regarding interim reclamation.

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
431166	WELL	DG	10/26/2014	SI	123-36449	BADGER 22N-3HZ	DG	<input checked="" type="checkbox"/>
431167	WELL	DG	11/01/2014	SI	123-36450	BADGER 12N-3HZ	DG	<input checked="" type="checkbox"/>
431168	WELL	DG	10/23/2014	SI	123-36451	BUFFALO 14C-15HZ	DG	<input checked="" type="checkbox"/>
431169	WELL	DG	11/05/2014	LO	123-36452	BUFFALO STATE 34N-15HZ	DG	<input checked="" type="checkbox"/>
431170	WELL	DG	10/27/2014	SI	123-36453	BADGER 12C-3HZ	DG	<input checked="" type="checkbox"/>
431171	WELL	DG	10/29/2014	SI	123-36454	BUFFALO 35C-15HZ	DG	<input checked="" type="checkbox"/>
431172	WELL	DG	10/20/2014	LO	123-36455	BUFFALO 14N-15HZ	DG	<input checked="" type="checkbox"/>
431173	WELL	DG	10/22/2014	SI	123-36456	BADGER 22C-3HZ	DG	<input checked="" type="checkbox"/>
431174	WELL	DG	10/16/2014	LO	123-36457	BADGER 25N-3HZ	DG	<input checked="" type="checkbox"/>

Inspector Name: Binschus, Chris

431175	WELL	DG	10/21/2014	SI	123-36458	BADGER 11N-3HZ	DG	<input checked="" type="checkbox"/>
431176	WELL	DG	11/02/2014	SI	123-36459	BUFFALO 13C-15HZ	DG	<input checked="" type="checkbox"/>
431177	WELL	DG	10/19/2014	LO	123-36460	BUFFALO 36C-15HZ	DG	<input checked="" type="checkbox"/>
431178	WELL	DG	10/30/2014	SI	123-36461	BUFFALO 13N-15HZ	DG	<input checked="" type="checkbox"/>
431179	WELL	DG	10/24/2014	SI	123-36462	BUFFALO 35N-15HZ	DG	<input checked="" type="checkbox"/>
431180	WELL	DG	11/02/2014	SI	123-36463	BADGER STATE 32C-3HZ	DG	<input checked="" type="checkbox"/>
431181	WELL	DG	10/17/2014	LO	123-36464	BADGER 11C-3HZ	DG	<input checked="" type="checkbox"/>

**Equipment:**

Location Inventory

Special Purpose Pits: _____	Drilling Pits: <u>2</u>	Wells: <u>16</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: <u>16</u>
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/A/V): \_\_\_\_\_

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

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

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

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
DEBRIS	ACTION REQUIRED	Straw bail and tree cutting debris in northwest location (Photo 15 Doc. #682400040)	Need to remove all debris from location.	11/20/2015

**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: 431161

**Site Preparation:**

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

**S/A/V:** \_\_\_\_\_

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

**Form 2A COAs:****S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_**Wildlife BMPs:****S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_**Stormwater:****Comment:** Ponding water in southern production area. Refer to Photos 16 and 17 in Doc. #682400040.**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: 431166 Type: WELL API Number: 123-36449 Status: DG Insp. Status: DG

Facility ID: 431167 Type: WELL API Number: 123-36450 Status: DG Insp. Status: DG

Facility ID: 431168 Type: WELL API Number: 123-36451 Status: DG Insp. Status: DG

Facility ID: 431169 Type: WELL API Number: 123-36452 Status: DG Insp. Status: DG

Facility ID: 431170 Type: WELL API Number: 123-36453 Status: DG Insp. Status: DG

Facility ID: 431171 Type: WELL API Number: 123-36454 Status: DG Insp. Status: DG

Inspector Name: Binschus, Chris

Facility ID: 431172	Type: WELL	API Number: 123-36455	Status: DG	Insp. Status: DG
Facility ID: 431173	Type: WELL	API Number: 123-36456	Status: DG	Insp. Status: DG
Facility ID: 431174	Type: WELL	API Number: 123-36457	Status: DG	Insp. Status: DG
Facility ID: 431175	Type: WELL	API Number: 123-36458	Status: DG	Insp. Status: DG
Facility ID: 431176	Type: WELL	API Number: 123-36459	Status: DG	Insp. Status: DG
Facility ID: 431177	Type: WELL	API Number: 123-36460	Status: DG	Insp. Status: DG
Facility ID: 431178	Type: WELL	API Number: 123-36461	Status: DG	Insp. Status: DG
Facility ID: 431179	Type: WELL	API Number: 123-36462	Status: DG	Insp. Status: DG
Facility ID: 431180	Type: WELL	API Number: 123-36463	Status: DG	Insp. Status: DG
Facility ID: 431181	Type: WELL	API Number: 123-36464	Status: DG	Insp. Status: DG

#### **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:

<b>Complaint:</b>				
Tracking Num	Category	Assigned To	Description	Incident Date
200437789	RECLAMATION	Arthur, Denise	<p>Maria Petrocco is an attorney filing a complaint on behalf of land owners in the Erie, CO area. COGCC was copied on a communication to Kerr-McGee regarding reclamation at wells in the area. The initial complaint to Kerr-McGee was not provided. The communication sent to COGCC is a reply to Anadarko representative Sherry Bursey's response to the complaint.</p> <p>Anadarko responded that COGCC rules permit delaying final reclamation if the areas are 'reasonably needed for production operations or subsequent drilling operations within twelve (12) months' as per rule 100.3(b). Ms. Bursey states, "Often times, KMG is still in the process of finalizing pipeline routes and ancillary operations that are necessary for specific wells and other drill sites in the same geographical area." Ms. Bursey specifically refers to wells Como 13C-14HZ, Como 34N-14HZ, and Como 13N-14HZ as being slated for interim reclamation for December 2015. Ms. Bursey states that KMG is submitting a variance for waiving 'certain interim reclamation requirements' at Badger wells. Ms. Bursey states that in anticipation of schedule delays the well pads have been stabilized with compacted road base and plating material.</p> <p>Ms. Petrocco's complaint in response to the Anadarko communication states, "While KMG may be working within the technical rules of the COGCC rules and regulations, I do not believe that KMG is acting with good faith and in the spirit of the rules. KMG gas drilled over 12 wells on property in the Erie area and these wells have not been completed. Therefore, the construction area around the well sites remain disturbed and unusable for the landowners... my clients cannot plant crops on the road base or graze their livestock on the plating material. All crop lands are required to be reclaimed within three months after drilling, unless the area is reasonably needed for subsequent operations. Does every well that is drilled need subsequent operations? We see a definite pattern of using this additional time for reclamation as a means to wait for oil and gas prices to rise before wells are completed. This choice may be a benefit to KMG but it is done at the expense of my clients whose livelihood depends on the very lands that you are holding hostage to maximize your profit...KMG may be following the letter of the reclamation rules, but these reclamation rules were never intended to be used as a means of drilling an unlimited number of wells when construction costs were low to play the waiting game for production prices."</p> <p>Complainants for this location include: George Eidness (Flying E Ranch and Como, LLC) and Shirley A Cleland. Complaint includes APIs 123-36457, 123-36464, 123-36456, 123-36458, 123-36453, 123-36450, 123-36459, 123-36463.</p>	10/19/2015

Emission Control Burner (ECB): \_\_\_\_\_

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

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Inspector Name: Binschus, Chris

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: DRY LAND, IRRIGATED

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

1003a. Debris removed? Fail CM Large drying Kochia/Russian thistle debris, see "COGCC Comments"

CA Remove Kochia/Russian thistle and dispose properly.

CA Date 11/20/2015

Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_

CA \_\_\_\_\_ CA Date \_\_\_\_\_

Unused or unneeded equipment onsite? Fail CM Unused or unneeded equipment needs to be removed.

CA Remove from location. Refer to photo 18 in Doc. #682400040.

CA Date 11/20/2015

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? Fail Production areas stabilized ? Fail

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? Fail

Production areas have been stabilized? Fail

Segregated soils have been replaced? \_\_\_\_\_

#### RESTORATION AND REVEGETATION

##### Cropland

Top soil replaced \_\_\_\_\_ Recontoured Fail Perennial forage re-established Fail

##### Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

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

Comment: Reclamation needs to occur on areas no longer needed for production operations.  
Weed maintenance is needed on site.  
Refer to 'COGCC Comments' concerning CAs and CA dates.

Overall Interim Reclamation Fail

#### Final Reclamation/ Abandoned Location:

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

Final Land Use: DRY LAND, IRRIGATED

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 \_\_\_\_\_

Inspector Name: Binschus, Chris

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

**COGCC Comments**

Comment	User	Date
Need to remove straw bale and tree cutting debris from northwest location by Corrective Action date of November 20, 2015.	binschusc	11/05/2015
Southeast and eastern production areas need to be stabilized from sediment movement and soil erosion needs to be controlled by Corrective Action date of November 20, 2015. Refer to photos 20-22 in Doc. #682400040.	binschusc	11/05/2015
Large piles of road base located in southeastern location needs to be removed by Corrective Action date of November 20, 2015 and reclaimed (Refer to photo 24 in Doc. #682400040). Currently, these road base piles are obstructing proper stormwater flows on location (Refer to photos 16 and 17).	binschusc	11/05/2015
Reclamation activities shall begin no later than November 30, 2015.		
Open depression located in southeast location needs to be reclaimed and contoured back to the reference cropland landscape. Refer to photo 19 in Doc. #682400040.	binschusc	11/04/2015
Reclamation activities shall begin no later than November 30, 2015.		
Unused or unneeded equipment needs to be removed from location by Corrective Action date of November 20, 2015. Refer to photo 18 in Doc. #682400040.	binschusc	11/04/2015
Kochia (Kochia sp.) and Russian thistle (Salsola sp.) exists throughout location. This is debris and will break off and encroach upon adjacent lands. Remove and dispose of properly by Corrective Action date of November 20, 2015. Refer to photos in Doc. #682400040.	binschusc	11/04/2015
Location does not meet reclamation regulations. Submit a Form 4 attached with a reclamation plan, and a map detailing interim reclamation for areas on the well pad no longer needed for production operations by Corrective Action date of November 20, 2015. The plan should include, at a minimum, a detailed schedule for reclamation activities, weed management plan, seed mixture, seed application method, interim stormwater controls with soil stabilization until the land can be returned to agricultural production, mulch type, and if needed, fertilizer/soil amendments and water. Refer to photos in Doc. #682400040.	binschusc	11/04/2015
Reclamation activities shall begin no later than November 30, 2015.		

**Attached Documents**

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

Inspector Name: Binschus, Chris

Document Num	Description	URL
682400040	Location photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3715499">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3715499</a>



## **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.)