



## COLORADO

Oil & Gas Conservation  
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

November 4, 2015

Steve, Schultz  
34978 WCR 83  
Briggsdale, CO 80611

Mr. Schultz,

The Colorado Oil and Gas Conservation Commission (COGCC) received your complaint regarding the reclamation of the pipeline right-of-way through your property. Your complaint is documented in COGCC document number 200436995, which can be found on the “Complaints” page, off of our main website <http://cogcc.state.co.us/>.

The COGCC investigated this complaint and documented the results in COGCC document number 673502754, which can be found on the “Complaints” page, off of our main website <http://cogcc.state.co.us/>. I have included the inspection report with this letter.

The following actions were taken by COGCC staff:

- Inspected the pipeline right-of-way through your property on August 31, 2015 (see document number 673502754).
- It was determined that further reclamation practices were needed to successfully establish vegetation along the pipeline right-of-way through your property.
- It was determined that immediate seeding practices may not promote establishment of vegetation due to seasonal temperature changes. A fall seeding was advised which may promote a more successful establishment of vegetation in the next growing season.
- As required by inspection document number 673502754 a reclamation plan was provided by the operator which has been included within this letter.

The COGCC did not identify any violations related to the pipeline right-of-way through your property. However, the vegetation along the pipeline right-of-way through your property does not meet the COGCC reclamation requirements and further actions will be taken according to the submitted plan.



Mr. Steve Schultz  
September 24, 2015  
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Therefore, the COGCC has determined that no violations occurred related to your complaint. Accordingly, the COGCC has closed the complaint upon receiving the reclamation plan and will not issue a notice of alleged violation (NOAV) related to this complaint.

If you have questions related to this investigation, please contact me. Thanks.

Sincerely,



Megan Adamczyk, Complaint Specialist  
303-894-2100 ext. 5145  
dnr\_cogcc.complaints@state.co.us

Inspector Name: COSTA, RYAN

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



Table with columns DE, ET, OE, ES

Inspection Date: 08/31/2015

Document Number: 673502754

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier, Facility ID, Loc ID, Inspector Name, On-Site Inspection, 2A Doc Num

Operator Information:

OGCC Operator Number, Name of Operator, Address, City, State, Zip

- 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:

Table with columns Contact Name, Phone, Email, Comment

Compliance Summary:

QtrQtr, Sec, Twp, Range

Inspector Comment:

Inspection in response to complaint #200436995.

Related Facilities:

Table with columns Facility ID, Type, Status, Status Date, Well Class, API Num, Facility Name, Insp Status

Equipment:

Location Inventory

Table with columns for various equipment types and counts

Location

Lease Road:

Table with columns Type, Satisfactory/Action Required, comment, Corrective Action, Date

<b>Signs/Marker:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
	SATISFACTORY			

Emergency Contact Number (S/A/V): SATISFACTORY Corrective Date: \_\_\_\_\_

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

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

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

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 430818

**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:**

BMP Type	Comment
Drilling/Completion Operations	BBC GENERAL PRACTICES
	<p><b>NOTIFICATIONS</b></p> <ul style="list-style-type: none"> <li>• Proper notifications required by COGCC regulations or policy memos will be adhered to</li> </ul> <p><b>TRENCHES/PITS/TEMPORARY FRAC TANKS</b></p> <ul style="list-style-type: none"> <li>• Unlined pits will not be constructed on fill material.</li> <li>• Drill cuttings from the wellbore will be directed into a lined and bermed surface containment. Any free liquids accumulated in the containment would be removed as soon as practicable.</li> <li>• Flowback and stimulation fluids from the wells being completed will be sent to tanks and/or filters to allow the sand to settle out before the fluids are hauled to a state approved disposal facility.</li> <li>• Temporary frac tanks installed on location will have proper secondary containment according to SPCC regulations such as either putting a perimeter berm around location or around the frac tanks.</li> </ul>

Storm Water/Erosion Control

STORM WATER AND SPILL CONTROL PRACTICES

GENERAL

- Utilize diking and other forms of containment and diversions around tanks, drums, chemicals, liquids, pits, impoundments, or well pads
- Use drip pans, sumps, or liners where appropriate
- Limit the amount of land disturbed during construction of pad, access road, and facilities
- Employ spill response plan (SPCC) for all facilities
- Dispose properly offsite any wastes fluids and other materials

MATERIAL HANDLING, ACTIVITIES, PRACTICES AND STORM WATER DIVERSION

- Secondary containment of tanks, drums, and storage areas is mandatory to prohibit discharges to surface waters. A minimum of 110% capacity required of largest storage tank within a containment area
- Material handling and spill prevention procedures and practices will be followed to help prohibit discharges to surface waters
- Proper loading, and transportation procedures to be followed for all materials to and from locations

EROSION CONTROL

- Pad and access road to be designed to minimize erosion
- Pad and access road to implement appropriate erosion control devices where necessary to minimize erosion
- Routine inspections of sites and controls to be implemented with additions, repairs, and optimization to occur as necessary to minimize erosion

SELF INSPECTION, MAINTENANCE, AND HOUSEKEEPING

- All employees are trained in spill response, good housekeeping, material management practices, and procedures for equipment and container washing annually
- Conduct internal storm water inspections per applicable stormwater regulations
- Conduct routine informal inspections of all tanks and storage facilities at least weekly
- All containment areas are to be inspected weekly or following a heavy rain event.
- Any excessive precipitation accumulation within containment should be removed as appropriate and disposed of properly
- All structural berms, dikes, and containment will be inspected periodically to ensure they are operating correctly

SPILL RESPONSE

- Spill response procedures as per the BBC field SPCC Plan

VEHICLE & LOCATION PROCEDURES

- Vehicles entering location are to be free of chemical, oil, mud, weeds, trash, and debris
- Location to be treated to kill weeds and bladed when necessary

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: \_\_\_\_\_

Inspector Name: COSTA, RYAN

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: 430818 Type: WELL API Number: 123-36317 Status: PR Insp. Status: PR

**Complaint**

Comment: **This inspection is in response to complaint #200436995 due to concerns of lack of reclamation performed along a pipeline which comes from the Greasewood 4-8H and travels through the complainants pasture which is south of the location. See complaint #200436995 for complete details. On 8/31/15, COGCC staff Ryan Costa met with the complainant's daughter. She identified where the pipeline disturbance occurred through the complainants pasture. There were pipeline markers along the pipeline through the pasture indicating it was Bill Barrett Corporation pipeline. The vegetation cover along the pipeline has not been adequately established and was predominately weeds (kochia, puncturevine, horseweed). SEE ATTACHED PHOTOS**

**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:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**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: CRP  
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? Fail Production areas stabilized? Pass  
 1003c. Compacted areas have been cross ripped? Fail  
 1003d. Drilling pit closed? Pass 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? Pass Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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

Comment: **A form 4 (400614749) was recieved stating that interim reclamation would commence by August 31, 2015. At the time of inspection, interim reclamation had not been performed and there was no equipment or indication that reclamation would commence.**

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

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

Final Land Use: CRP \_\_\_\_\_

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: COSTA, RYAN

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
Gravel	Pass	Gravel	Pass			

S/AV: **ACTION REQUIRED** Corrective Date: **09/23/2015**

Comment: Interim reclamation had not been performed at the time of inspection. Weeds were the predominate vegetation growing on the topsoil pile. Areas no longer needed have not been reclaimed. The pipeline which runs south of the location and west through the complainants property has not been properly reclaimed. SEE ATTACHED PHOTOS

CA: Submit a plan by 9/23/15 for performing reclamation at this location and along the nearby pipeline through the complainants property. Within the plan provide a timeline of the reclamation activities which will need to be completed by October 30th of 2015.

Pits:  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
A form 4 (400614749) was recieved stating that interim reclamation would commence by August 31, 2015. At the time of inspection, interim reclamation had not been performed and there was no equipment or indication that reclamation would commence. It was also mentioned within the form 4 that " All stockpiled soils shall be protected from degradation and best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented." It was noticed that weeds were the predominate vegetation growing on the topsoil pile.	CostaR	09/09/2015
Submit Form 4 when corrective actions are completed. Include photographs of the vegetation in four cardinal directions as well as one close up of the plant community and/or documenting completion of corrective actions required in this inspection.	CostaR	09/04/2015
All reclamation activities will need to be completed no later than October 30th of 2015. A reclamation timeline and plan detailing the reclamation activities performed needs to be submitted by the corrective action date of September 23rd of 2015.	CostaR	09/04/2015

**Attached Documents**

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

Document Num	Description	URL
673502754	INSPECTION APPROVED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678886">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678886</a>
673502755	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678884">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678884</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.)

**Response to COGCC Field Inspection Report (Document #673502754)**  
**Greasewood 4-8H**

Bill Barrett Corporation (BBC) has or will complete the following actions by October 30, 2015. As noted below, depending on weather conditions, seeding of the location and pipeline may not occur by October 30, 2015 but will occur during the late fall of 2015.

**Greasewood 4-8H Location**

The well on this pad was recently re-frac'd and work related to interim reclamation had started prior to the COGCC field inspection. Materials and equipment related to the re-frac were in the process of being removed and flow-back equipment rearranged on the location to facilitate interim reclamation. Dirt work on the location commenced the morning of September 2, 2015 and will be completed by approximately September 21, 2015. Seeding of the location with an appropriate seed mix will take place as late in the fall of 2015 as possible but, pending weather conditions, should be completed by October 30, 2015. Photographs of the work in progress as of September 17, 2015 are attached.

**Pipeline**

This pipeline right-of-way (ROW), both on and off of the complainant's property, was reseeded in the fall of 2013. In comparing the portions of the ROW that are not on the complainant's property have significantly more vegetation than on the complainant's property and BBC believes that the fact that the complainant's cattle appear to move along the fence line adjacent to the pipeline is one of the primary reasons that the vegetation has not established as successfully as desired. The actions that BBC will take include over seeding the ROW on the complainant's property by hand raking and broadcast seeding; continued weed control; and, pending landowner approval, constructing a temporary fence on the south side of the ROW to prevent the cattle from entering the ROW until vegetation has been successfully re-established. As noted for the oil and gas location, seeding will be completed as late in the fall as possible to increase the chances for success.



Entrance to Greasewood 4-8H location looking north – September 17, 2015



Greasewood 4-8H location looking north-northwest – September 17, 2015



Greasewood 4-8H location looking north-northeast - September 17, 2015



Greasewood 4-8H location looking west – September 17, 2015