



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



DE	ET	OE	ES
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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:
	430818	430817	COSTA, RYAN	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number: 10071
Name of Operator: BARRETT CORPORATION* BILL
Address: 1099 18TH ST STE 2300
City: DENVER State: CO Zip: 80202

- ☐ 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
Fallang, Tracey	303-312-8134	tfallang@billbarrettcorp.com	All Inspections
Zavadil, Duane		dzavadil@billbarrettcorp.com	All Inspections
Pobuda, Mary		mpobuda@billbarrettcorp.com	All Inspections
Arthur, Denise		denise.arthur@state.co.us	

Compliance Summary:

QtrQtr: SESW Sec: 8 Twp: 6N Range: 61W

Inspector Comment:

Inspection in response to complaint #200436995.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
430818	WELL	PR	01/28/2014	OW	123-36317	Greasewood 4-8H	PR	<input checked="" type="checkbox"/>

Equipment:

Location Inventory

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

Location

Lease Road:				
Type	Satisfactory/Action Required	comment	Corrective Action	Date
	SATISFACTORY			

Inspector Name: COSTA, RYAN

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

Emergency Contact Number (S/A/V): SATISFACTORY 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: 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
	NOTIFICATIONS
	<ul style="list-style-type: none">• Proper notifications required by COGCC regulations or policy memos will be adhered to
	TRENCHES/PITS/TEMPORARY FRAC TANKS
	<ul style="list-style-type: none">• Unlined pits will not be constructed on fill material.• 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.• 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.• 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.

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 <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
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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678886
673502755	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3678884

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