FORM INSP Rev X/15

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

FIELD INSPECTION FORM

Inspection Date: 07/11/2017
Submitted Date: 07/14/2017
Document Number: 682402391

Loc ID	Inspector Name:	On-Site Inspection	
445209	Binschus, Chris	2A Doc Num:	

Operator Information:

OGCC Operator Number: 100322
Name of Operator: NOBLE ENERGY INC
Address: 1625 BROADWAY STE 2200
City: DENVER State: CO Zip: 80202

Status Summary:

- [x] THIS IS A FOLLOW UP INSPECTION
- [x] FOLLOW UP INSPECTION REQUIRED
- [ ] NO FOLLOW UP INSPECTION REQUIRED

Findings:

11 Number of Comments
4 Number of Corrective Actions
[x] Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
,		NBL_DJBU_Inspections@NBLENERGY.COM	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
445203	WELL	DG	01/23/2017		123-42948	Holliday Federal LC23-785	RI
445204	WELL	DG	01/12/2017		123-42949	Holliday Federal LC23-775	RI
445205	WELL	DG	01/19/2017		123-42950	Holliday Federal LC23-780	RI
445206	WELL	DG	01/19/2017		123-42951	Tombstone Federal LC23-765	RI
445207	WELL	DG	01/14/2017		123-42952	Tombstone Federal LC23-760	RI
445208	WELL	DG	01/04/2017		123-42953	Tombstone Federal LC23-755	RI

General Comment:

This is a follow up stormwater and reclamation inspection to FIR Document #682401989. Also, this is in response to FIRR Document #401277395, stating “Noble Energy completed repairs on BMPs installed as per Noble’s BMP Manual”. It should be noted this location was associated with a Warning Letter (Document #401193990) that was sent to the Operator on January 25, 2017 because the Operator failed to install BMPs prior to, or at the beginning of, construction. See the Stormwater section and COGCC Comments section for additional information. If corrective actions from the previous inspection report remain unresolved, corrective action dates will remain unchanged.

Location

Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action: Date:

Good Housekeeping:

Type	WEEDS		
Comment:	Weedy, annual Russian thistle (Salsola tragus) and Kochia (Kochia scoparia) were observed throughout most disturbance areas, including topsoil stockpiles. Operator needs to control and manage both Russian thistle and Kochia using the best available practices, as this is weed waste and will spread onto adjacent lands. At maturity, Russian thistle often breaks off at the soil line and tumble long distances with the wind, widely dispersing seed for several kilometers (Stallings et al. 1995). Seed remains viable 2-3 years (Larimer County 5th Edition Weed Management Reference Guide).		
Corrective Action:	Comply with Rule 603.f. to control and manage weedy, annual vegetation to prevent weed waste and prevent spread of dispersing seeds onto adjacent lands.	Date:	07/28/2017

Overall Good: ☐

Spills:

Type	Area	Volume			

In Containment: No

Comment:

☐ Multilple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID:	445203	Type:	WELL	API Number:	123-42948	Status:	DG	Insp. Status:	RI
Facility ID:	445204	Type:	WELL	API Number:	123-42949	Status:	DG	Insp. Status:	RI
Facility ID:	445205	Type:	WELL	API Number:	123-42950	Status:	DG	Insp. Status:	RI
Facility ID:	445206	Type:	WELL	API Number:	123-42951	Status:	DG	Insp. Status:	RI
Facility ID:	445207	Type:	WELL	API Number:	123-42952	Status:	DG	Insp. Status:	RI
Facility ID:	445208	Type:	WELL	API Number:	123-42953	Status:	DG	Insp. Status:	RI

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment:

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment

Corrective Action Date

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment

Corrective Action Date

1002c. PROTECTION OF SOILS Fail

Comment: All topsoil stockpiles have significant weed cover including Russian thistle and Kochia with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth.

Corrective Action: Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles by 7/28/2017. Seeding is a best management practice to prevent weed establishment and accomplishes interim reclamation requirements. Seed the topsoil stockpiles during the next favorable seeding season. Date **07/28/2017**

1002E. SURFACE DISTRURBANCE MINIMIZATION In Process

Comment: The access point identified in the previous inspection is actually the flowline ROW.

Corrective Action Date

1003a. Waste and Debris removed? _____

Comment

Corrective Action Date

Unused or unneeded equipment onsite? _____

Comment

Corrective Action Date

Pit, cellars, rat holes and other bores closed? _____

Comment

Corrective Action Date

Guy line anchors marked? _____

Comment

Corrective Action Date

Inspector Name: Binschus, Chris

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 Fail

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment: Vegetation in portions of the interim reclamation area is predominantly undesirable weedy plant species, Russian thistle and Kochia, and is likely hindering the establishment of desirable vegetation. These areas will need to be reseeded to establish a uniform vegetation cover of at least eighty (80) percent of reference area levels.

Corrective Action: Perform reclamation in portions of the interim reclamation area in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

Date **10/16/2017**

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

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

Final Land Use: RANGELAND

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 _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

Inspector Name: Binschus, Chris

VEGETATIVE COVER _____

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
Sediment Traps	Fail					
Berms	Fail					18" berm on pads not properly compacted
Silt Fences	Fail					Improperly installed-see photos for details
Tracking Pad	Fail					Only cattle guards and in need of maintenance
Hydro Mulch	In Process					
Waddles	Fail					Improperly installed-see photos for details

Comment: Noble Energy (Operator) does not appear to have implemented and maintained Best Management Practices (BMPs) to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation per Rule 1002.f.(2). Operator does not appear to have implemented BMPs in accordance with good engineering practices per Rule 1002.f.(2). Sediment discharge was observed along the southeast Tombstone pad. See attached inspection photos for more details. Previous inspection noted BMPs have not been properly installed to control stormwater runoff from portions of the location. During the current inspection (7/11/2017), these issues were still observed.

Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective actions from the previous inspection were not resolved therefore the corrective action dates on this inspection remain the same from the previous inspections. See COGCC Comments for addition details.

Date: 05/09/2017

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Noble sent in FIRR Document #401277395 stating that “Noble Energy completed repairs on BMPs installed as per Noble’s BMP Manual”. Per this inspection, stormwater controls were inadequate and the Operator has not installed sediment traps or other BMPs in accordance to their own BMP Manual. The Operator has failed to implement their suggested BMP specifications. For example, the five sediment traps installed for this location (totaling 13.30 acres of disturbance) have a sediment trap volume capacity for both dry and wet storage that equals approximately 182 ft3. Based off Noble’s own BMP Manual, the required sediment trap volume for one acre is 3,600 ft3. Therefore, based off Nobles BMP Manual, the sediment trap volume for the entire location would require approximately 47,880 ft3 of sediment trap volume.	binschusc	07/13/2017

Attached Documents

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

Document Num	Description	URL
682402396	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4197827