

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401467352  
Date Received:  
11/23/2017

FIR RESOLUTION FORM

CA Summary:  
1 of 1 CAs from the FIR responded to on this Form  
1 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10459  
Name of Operator: EXTRACTION OIL & GAS INC  
Address: 370 17TH STREET SUITE 5300  
City: DENVER State: CO Zip: 80202  
Contact Name and Telephone:  
Name:  
Phone: ( ) Fax: ( )  
Email:

Additional Operator Contact:

Contact Name Phone Email  
Jeff Rickard (720) 737-5144 jrickard@extractionog.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 682502817  
Inspection Date: 11/14/2017 FIR Submit Date: 11/16/2017 FIR Status:

Inspected Operator Information:

Company Name: EXTRACTION OIL & GAS INC Company Number: 10459  
Address: 370 17TH STREET SUITE 5300  
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 323581

Location Name: FERGUSON-65N65W Number: 35NESE County:  
Qtrqr: NESE Sec: 35 Twp: 5N Range: 65W Meridian: 6  
Latitude: 40.353876 Longitude: -104.623477

FACILITY - API Number: 05-123- -00 Facility ID: 323581

Facility Name: FERGUSON-65N65W Number: 35NESE  
Qtrqr: NESE Sec: 35 Twp: 5N Range: 65W Meridian: 6  
Latitude: 40.353876 Longitude: -104.623477

CORRECTIVE ACTIONS:

1 CA# 110909

Corrective Action: Original corrective action and corrective action date remains applicable. Install or repair required BMPs per Rule 1002.f Date: 08/18/2017

Response: CA COMPLETED Date of Completion: 11/22/2017

Operator Comment: In response to COGCC Follow Up Inspection #: 682502817, dated 11/16/2017, Extraction Oil & Gas Inc (Extraction) would like to submit this formal response with a brief history and timeline of Extraction's relationship to this location, COGCC reclamation and stormwater inspection findings and short-term efforts to address identified issues, and current plans for reclamation and stormwater upgrades to provide long-term solutions to the issues that have been raised.

Location History

Extraction acquired this location and an ongoing remediation project from Bayswater Exploration and Production, LLC (Bayswater) in October, 2016, with final COGCC approval in February, 2017. As indicated, this acquisition included the transfer of an ongoing remediation project (8905), initiated under a NOAV issued to Bayswater. The location was incorporated into Extraction's compliance monitoring program as a reclaimed location. The history of surface management and reclamation activities at this location are unknown, and can only be inferred by current site conditions.

#### Landowner Interactions

Beginning in July, 2017, COGCC inspections noted site degradation and offsite sediment discharge into an adjacent irrigation return ditch. Follow up inspections were completed in August, September, and as previously indicated, November with similar findings and concerns indicated. In response to these inspection findings and the corrective action to install stormwater BMPs to limit site degradation and offsite discharge of sediment, Extraction began discussions with the landowner (Mr. Anderson) in August, 2017 to upgrade the location. Mr. Anderson has been steadfast in his position that the location is on his property, and that oil and gas doesn't know anything about farming.

On October 13, 2017, it was explained to Mr. Anderson that the COGCC still had authority over the former oil and gas disturbance. The most recent inspection findings and ongoing corrective action were reviewed with him. He stated that it's his property and that he would decide what was installed and how it was managed and was adamant that no wattles, ditches, or berms would be installed. He did agree to rip the location to two feet, install a diversion ditch on the east side of the pad as run-on control, and remove sediment from the ditch and add a berm to prevent stormwater from running into the ditch. He did not allow any earthwork to be completed by the Extraction contractors onsite and completed the work himself as he thought appropriate.

Mr. Anderson also indicated a concern about pesticide applications on the surface being a possible reason for the lack of revegetation at the site. An Extraction environmental contractor collected five soil samples on October 17, 2017 for laboratory analysis for possible presence of herbicides. Laboratory results were negative for submitted soil samples.

#### Reclamation and Stormwater Plans

Based on the condition of the location and the general lack of vegetation from the previous reclaim, Extraction is in the process of reCompleting the reclamation at this site. On 11/22/17 three to twelve inches of topsoil was imported to the site, disked, regraded, and drill-seeded. To address the offsite discharge of sediment and promote overall site conditions on 11/24/2017 hydromulch will be applied to the entire disturbance. In addition, the site will also receive monthly stormwater inspections until the site is final-stabilized with vegetation.

If you have any questions about the history of this location or plans to address documented stormwater issues, please don't hesitate to contact us.

COGCC Decision: **Not Approved**

COGCC Representative: Resolution Not Approved. Based on operator comments, corrective action not completed at time of resolution submittal. A follow-up inspection will be conducted to evaluate compliance with COGCC rules.

#### OPERATOR COMMENT AND SUBMITTAL

Comment: On 11/22/17 three to twelve inches of topsoil was imported to the site, disked, regraded, and drill-seeded. To address the offsite discharge of sediment and promote overall site conditions on 11/24/2017 hydromulch will be applied to the entire disturbance. In addition, the site will also receive monthly stormwater inspections until the site is final-stabilized with vegetation.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Jeff Rickard

Signed: \_\_\_\_\_

Title: Regulatory Compliance Co

Date: 11/23/2017 9:09:53 AM

#### ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

#### **Document Number**      **Description**

401467352	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files