

**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



Inspection Date:

06/15/2018

Submitted Date:

06/18/2018

Document Number:

682503493

**FIELD INSPECTION FORM**

Loc ID 331849 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

**Operator Information:**

OGCC Operator Number: 10112  
Name of Operator: FOUNDATION ENERGY MANAGEMENT LLC  
Address: 5057 KELLER SPRINGS RD STE 650  
City: ADDISON State: TX Zip: 75001

**Findings:**

- 4 Number of Comments
- 2 Number of Corrective Actions
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
,		dnr_cogccenforcement@state.co.us	
		dnr_cogcc.complaints@state.co.us	
,		regulatory@foundationenergy.com	All Inspections
		jsauer@foundationenergy.com	
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
266746	WELL	PA	04/15/2017	OW	123-21395	KRAGER 22-12	RI

**General Comment:**

This is a final reclamation and good housekeeping inspection in response to a complaint.

Complainant contacted Reclamation staff on 6/12/2018 in regards to noxious weed concerns on Foundation Locations and submitted complaint doc. #200445970 stating that "Diffuse Knapweed has returned to both locations" on 6/13/2018. The locations in reference are the Krager TB/well location and the SOONER SE SEC 21 TB location, both of which have past complaints regarding noxious weed concerns (see inspection #682401201 and inspection #682401240).

On 6/13/2018 at 15:09, upon receiving a formal complaint, Reclamation Specialist Trujillo contacted complainant via phone to discuss concerns. Complainant stated that operator has failed to perform weed management, and weeds (Diffuse Knapweed) has continued to grow and spread from the location onto their property.

See "Good Housekeeping".

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	WEEDS		
Comment:	Operator has failed to perform weed management; Diffuse Knapweed ( <i>Centaurea diffusa</i> ) has continued to establish on the location, and spread onto adjacent lands. This is a Colorado State Listed noxious weed and needs to be managed and removed in accordance to COGCC Rules 603.f, 1003.f, and in accordance to the Colorado State Noxious Weed Act. Field bindweed ( <i>Convolvulus arvensis</i> ) concerns have also been previously documented on location. Operator compliance concerns regarding noxious weeds have been documented since 2015 (Insp. #673502680).		
Corrective Action:	Properly remove and control noxious weeds. Ongoing weed management and monitoring is required, and needs to occur in accordance to COGCC rules and regulations. Due to the significant nature, extent, or duration of this alleged rule violation immediate referral to enforcement is required and a corrective action date will not be applied. Perform the corrective action immediately (no later than 24 hours) to avoid further enforcement and potential penalties.		Date:

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 266746 Type: WELL API Number: 123-21395 Status: PA Insp. Status: RI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

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

Land Use: \_\_\_\_\_

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 \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

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 \_\_\_\_\_

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 \_\_\_\_\_

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

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

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

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

Reminder: \_\_\_\_\_

Comment:

Well plugged Pass Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation **Fail** Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage \_\_\_\_\_

Weeds present **Fail** Subsidence \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

Comment:

Form 6s Doc. #401263294 states well was PA'd 4/13/2017. COGCC Reclamation rule 1004.a requires reclamation activities on well locations and access roads including, but not limited to, compaction alleviation, recontour/regrading, and revegetation activities to be completed within twelve (12) months on non-crop land after plugging a well.

This location does not meet reclamation requirements or standards. Access road / cattle guard remains and location remains predominantly bare and exposed soil, or predominantly undesirable weedy plant species; unable to find evidence that reclamation activities have been conducted. Reclamation activities should have been conducted by 4/13/2018.

Corrective Action:

Perform reclamation in accordance to COGCC 1000 series rules and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or 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 Final Reclamation has passed.

Date **04/17/2018**

Overall Final Reclamation

**Fail**

Well Release on Active Location

Multi-Well Location

**Attached Documents**

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

Document Num	Description	URL
682503494	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4497905">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4497905</a>