

**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:

06/19/2018

Submitted Date:

06/20/2018

Document Number:

682503518

FIELD INSPECTION FORM

Loc ID 439341 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: 10414
Name of Operator: CASCADE PETROLEUM LLC
Address: P O BOX 3316
City: DENVER State: CO Zip: 80155

Findings:

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

Contact Information:

Contact Name	Phone	Email	Comment
		jason.craig@denhamcapital.com	
		skuntz@cascaedepetroleum.com	
		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
439342	WELL	PA	06/09/2015	OW	073-06669	GAEDE A9S-55W-05-85	RI

General Comment:

This is a follow-up, final reclamation and stormwater inspection to doc. #682502556 and #401456968. Any corrective actions from previous inspections that have not been addressed are still applicable.

Inspected Facilities

Facility ID: 439342 Type: WELL API Number: 073-06669 Status: PA 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 _____

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: RANGELAND _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation **Fail** 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 _____
 VEGETATIVE COVER _____

Comment:

Corrective Action:

Date **11/15/2017**

Perform reclamation in accordance to COGCC 1000 series requirements on access road including, but not limited to, removing gravel, compaction alleviation, recontour/grade 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. Revegetation activities shall be complete no later than 11/15/2017

Overall Final Reclamation **Fail** 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
Waddles	Fail	Gravel	Fail			Straw Wattles

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER](#)

Corrective Action: **Repair erosion and stabilize location. Install or repair required BMPs in accordance to good engineering practices per rule 1002.f, and maintain BMPs until final reclamation has passed.**

Date: 10/19/2017

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Inspection #682502556 dated 9/13/2017, #682502781 dated 11/09/2017 and #682503104 dated 1/29/2018 required operator to Repair erosion and stabilize location. Install or repair required BMPs in accordance to good engineering practices per rule 1002.f by 10/19/2017.</p> <p>Operator submitted FIRR #401651836 on 5/24/2018. Resolution states that "Erosion controls have been re-vamped" with date of completion 4/16/2018. It is noted that this is six (6) months after the required corrective action dated.</p> <p>Straw wattles have been placed on location and it appears that work was conducted on the slopes to repair erosion concerns. However, wattles have not been properly installed in accordance to good engineering practices per the corrective actions; straw wattle are a temporary control that must be entrenched and backfilled to be in proper functioning condition. Wattles been placed directly upon the surface of the soil and have not been entrenched and backfilled. Operator has been notified of these installation requirements in previous inspections. As a result, stormwater erosion and degradation has continued on the location, and is cutting beneath the new wattles.</p> <p>In addition, stormwater erosion degradation is now occurring at location entrance and the access road.</p> <p>See attached photos.</p> <p>Original corrective action and corrective action date remains applicable. Stormwater management and monitoring needs to occur on an ongoing basis until final reclamation has passed.</p>	trujilloam	06/20/2018

<p>RECLAMATION COMMENTS</p> <p>Inspection #682502556 dated 9/13/2017, #682502781 dated 11/09/2017 and #682503104 dated 1/29/2018 documented that the access road, including areas on the west end of the fenced location, leading north, has not been reclaimed in accordance to COGCC 1000 series reclamation standards and requirements. These inspections required operator to perform reclamation in accordance to 1004.a including, but not limited to, removing gravel, compaction alleviation, recontour/grade and revegetation activities by 11/15/2017.</p> <p>On 11/15/2017, operator submitted Form 4 #401459468. Operator has indicated that a 502.b variance will be submitted for the access road.</p> <p>On 05/24/2018, operator submitted FIRR #401651836 stating "Corrective Action Complete", that gravel has been removed from well pad. Operator states "Gravel will stay on the access road. The surface owner wants to keep the access road, but is not ready to sign a reclamation variance". FIRR was not approved. Note, three years have passed since plugging date (6/9/2015), no 502.b variance request has been submitted by the operator; Access road remains subject to COGCC 1000 series reclamation requirements.</p> <p>This location does not meet reclamation requirements. Gravel has not been removed from the west end of the fenced location (well pad) where the access road existed as indicated by the FIRR. No reclamation work, including but not limited to removing gravel, compaction alleviation, recontour/grade and revegetation activities, has been conducted on access road. Original corrective action and corrective action date remains applicable.</p>	<p>trujilloam</p>	<p>06/20/2018</p>
<p>This location is being referred to enforcement.</p>	<p>trujilloam</p>	<p>06/20/2018</p>

Attached Documents

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

Document Num	Description	URL
401680915	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4500605
401682318	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4501867