

**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:

08/14/2018

Submitted Date:

08/23/2018

Document Number:

682503716**FIELD INSPECTION FORM**
 Loc ID 439341 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:                     
**Operator Information:**OGCC Operator Number: 10414Name of Operator: CASCADE PETROLEUM LLCAddress: P O BOX 3316City: DENVER State: CO Zip: 80155**Status Summary:**

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

**Findings:**6 Number of Comments3 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		griggs.mary@comcast.net	
		skuntz@casca depetroleum.com	
Arthur, Denise		denise.arthur@state.co.us	
		jason.craig@denhamcapital.com	

**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 to doc. #682502556 dated 9/13/2017, doc. #682502781 dated 11/9/2017, doc. #682503104 dated 1/29/2018 and doc. #682503518 dated 6/19/2018.

Inspection is also in response to FIR Resolution form #401459434 dated 8/10/2018

Inspection is also in response to a 1001.c, 502.b reclamation variance request. Operator submitted doc. #401701953 on 07/12/2018 requesting that ~0.2 miles of access road be left un-reclaimed per the request of the surface owner. This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the "1001.c: Reclamation Variances and Waivers" operator guidance document. Staff is going to deny a portion of the variance where ~100 yards of the road overlaps with the location. The rest of the road variance is still under review with staff.

Please note that the submission of a variance request does not guarantee approval. The COGCC will provide notice to Operator once an official decision has been made.

All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation; any corrective action(s) from previous inspections that have not been addressed will remain applicable.

**Location****Lease Road:**

Type	Access		
comment:	The surface owner letter attached to the variance request states that "the access road pre-dates the wellsite and has historically been used to access the property".		
Corrective Action:	Submit documentation showing that access road leading to the well locaiton pre-dates the Oil and Gas location disturbance.	Date:	08/30/2018

Overall Good: ☐**Emergency Contact Number:**

Comment:		Date:	
Corrective Action:			

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



**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 \_\_\_\_\_ Contoured \_\_\_\_\_ 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: [SEE "COGCC COMMENTS" FOR COMMENT REGARDING RECLAMATION.](#)

Corrective Action: \_\_\_\_\_ Date **11/14/2017**

Perform reclamation in accordance to COGCC 1000 series requirements on access road within location including, but not limited to, removing gravel, compaction alleviation, recontour/regrade 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

Comment: [SEE "COGCC COMMENTS" REGARDING STORMWATER COMMENTS](#)Corrective Action: [Repair erosion and stabilize location. Install or repair required BMPs 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><b>STORMWATER COMMENTS</b></p> <p>On 8/10/2018 operator submitted FIRR #401459434 stating "CA Completed". Operator comments state "Gravel was removed from the road inside the fence (well pad location) and erosion logs were re-installed. The area was re-hydromulched". Photo documentation provided by the operator shows that additional erosion logs appear to have been installed along areas of the access road north of the location, and that work appears to have been conducted on areas of the reclaimed access road in the northwest corner of the location. These controls have not been installed in accordance with good engineering practices and are inadequate for the sites conditions.</p> <p>Operator did not provide details, or documentation showing that stormwater erosion degradation along access road, or the southwestern areas of the location have been repaired and stabilized in accordance to the corrective action, and COGCC rule 1002.f.</p> <p>Access road has not been sufficiently stabilized and erosion degradation remains evident and has continued to allow transport of sediment off location. Areas of erosion degradation documented in previous inspections along access road and location entrance do not appear to have been properly repaired and stabilized. Stormwater BMPs are not in proper functioning condition, or sufficient to mitigate stormwater and sediment erosion degradation. See photos 1-6 in the attached photo document.</p> <p>Erosion degradation concerns previously documented on the southwest areas of the location do not appear to have been repaired, or sufficiently stabilized per the corrective action; Erosion degradation remains evident.</p> <p>Unable to find evidence of hydromulching/reseeding activities on areas degraded/"washed-out" by stormwater. Erosion control BMPs have either not been repaired or appropriately re-installed/maintained in accordance to good engineering practices; Stormwater BMPs to not appear to be in proper functioning condition or sufficient to mitigate stormwater and sediment erosion degradation. See photos 12-18 in the attached photo document.</p> <p>Original corrective action and corrective action date remains applicable.</p> <p>Continued failure to perform required stormwater management and stabilization on the location and access road will result in COGCC referral to enforcement.</p>	trujilloam	08/16/2018

**RECLAMATION COMMENTS**

trujilloam

08/16/2018

This location does not meet reclamation requirements. Corrective actions required operator to "Perform reclamation in accordance to COGCC 1000 series requirements on access road, including, but not limited to, removing gravel, compaction alleviation, recontour/regrade and establish vegetation". Gravel/road base remains evident along access road within the location. Gravel/road base remains evident on the access road within the location. The variance for the portion of the access road that is within the location is denied. The portion of the road must be completely reclaimed. The remaining portion of the road north of the location is being reviewed by staff, however, significant roadwork must be conducted so the road meets the stormwater rules, which a waiver cannot be granted for. Please see photos 8-11 in the attached photo document.

**Attached Documents**

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

Document Num	Description	URL
682503717	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4560773">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4560773</a>