

Corrective Information

<u>Location</u>			
<u>Lease Road:</u>			
Type	Access		
comment:	Rutting evident on areas of the access road to the south of the location. See photo 42. Water appears to have ponded in this area. Evidence of vehicle traffic traveling off the access road to avoid this area. Access road will require maintenance and BMPs installed to allow for appropriate vehicular travel, and to minimize unnecessary land disturbances in accordance to 1002.e(4)		
Corrective Action	Minimize off-location disturbances in accordance to Rule 1002.e(4). Conduct maintenance on access road and implement BMPs as needed to facilitate travel.		Date: <u>08/21/2018</u>
Overall Good:	<input type="checkbox"/>		
<u>Signs/Marker:</u>			
Type	TANK LABELS/PLACARDS		
Comment	Barrels observed on the south end of the pad lack the appropriate labeling in accordance to 210.d. Barrels will require appropriate labeling if not removed from location. See photos 28-31		
Corrective Action	Install labeling to comply with Rule 210.d.		Date: <u>08/23/2018</u>
Emergency Contact Number:			
Comment:			
Corrective Action: Empty Barrels Removed. Lease Road has no changes. In order to minimize land disturbances and future reclamation the path was widened as to reduce rutting and washouts-See Picture below Date:8-24-18			



Type	STORAGE OF SUPL		
Comment:	2A permitted disturbance 2 acres, Oil and gas location disturbance expanded an additional 1.12 acres. In addition, Oil and gas activities are being conducted outside the excavated, expanded location on an undisturbed, unpermitted surface; oil and gas equipment stored beyond areas of the constructed pad and fence. See photos 5, 24-25, 28-32		
Corrective Action:	Provide immediate notice via FIRR when equipment has been removed from areas beyond the permitted disturbance area. Any additional disturbances will require reclamation in accordance to COGCC 1000 series rules. The corrective action date will be based on the Form 42, document 401710401, construction start date. Removed and corrected 8/24/18	Date:	<u>07/25/2018</u>



Erosion BMPs	Present	Other BMPs	Present

Comments: Erosion BMPs:

Other BMPs: Operator has implemented insufficient surface roughening on the western and eastern perimeter of the location. Surface roughening appears inadequate and is not being used in conjunction with other BMPs

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f

Date: 07/25/2018

Comments: Erosion BMPs:

Other BMPs: Insufficient perimeter stormwater and erosion control BMPs; sufficient controls have not been installed or maintained on the northern and southern perimeter of the location in accordance to 1002.f and permit-required COAs per the 2A doc. #401333215

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f and COAs

Date: 07/25/2018

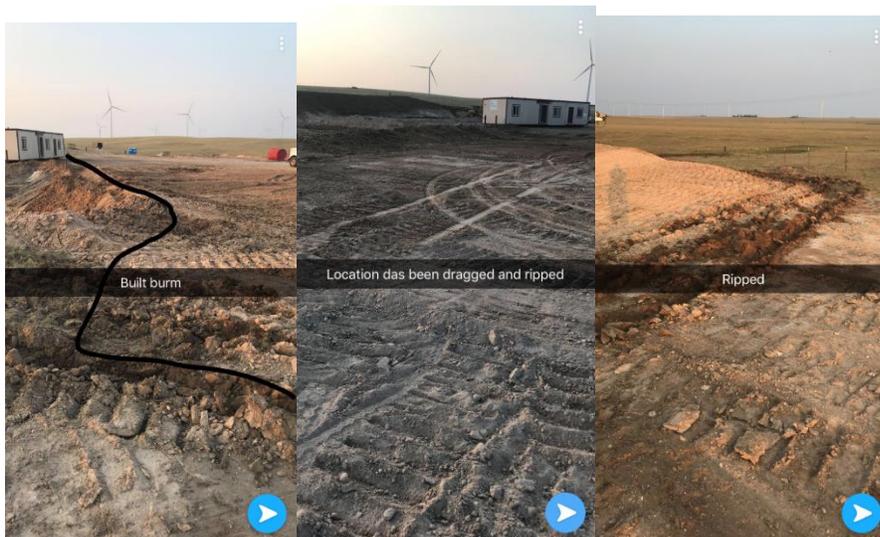
Comments: Erosion BMPs:

Other BMPs: It appears as though berms have been constructed utilizing topsoil. Topsoil should not be used as stormwater berms due to berms requiring compaction in accordance to good engineering practices, which would damage/alter the soil structure of the topsoil.

Berms have not been constructed in accordance with good engineering practices; berms have not been sufficiently compacted and is considered a sediment source.

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f Installed requested berms and compacted in accordance with good engineering practices

Date: 07/25/2018



Comments: Erosion BMPs:

Other BMPs: Various chemicals/fluids from drilling operations appear to be ponding on the north end of the pad rather than the intended production pit. This is a potential stormwater pollutant source.

Corrective Action: Remove ponding chemicals from the pad. Contaminated soils will require cleaning/remediation or removal. Provide us with information identifying fluid constituents ponding on the pad. **Rainwater from low spot Removed and sent to landfill and low spot filled in** Date: 08/27/2018

Comments: Erosion BMPs: Four (4) barrels observed being stored on the ground on the south end of the location (two observed beyond the south end of the fenced area). One barrel was observed being stored with the top placed open and down upon the surface of the soil. Two gas cans observed next to the trailers on the west end of the pad. Materials being stored on the northwest corner of the pad appear to have been spilled onto the location. This is improper materials management and possible stormwater pollutant source.

Other BMPs: Containers (barrels, cans) need to be placed in secondary containment or removed and properly stored or disposed. Barrels missing the required labeling. See "Signs/Markers"

Corrective Action: Immediately store barrels/containers within secondary containment or remove and properly store or dispose. Any contamination to the soil surface will need to be cleaned/remediated. Operator will also be required to provide MSDS sheets for the barrels, including a manifest of where barrels were taken to if removed/disposed, and a manifest of any contaminated soils that were cleaned up. Submit records via form 4.-**Barrels removed and soil disposed of. All MSDS (SDS) sheets attached hereto** Date: 08/21/2018

Comments: Erosion BMPs: Work/Office trailers on the west end of the pad appear to have discharged sewage onto the pad. See attached photo document. Sewage discharge is a stormwater pollutant source in accordance to 1002.f and a public health and safety issue. **Sewage put in proper sewage containment**

Other BMPs: Location is within a designated sensitive area. This is also in violation of 602.h which requires sanitary facilities to be sufficiently self contained during drilling operations. This is also a possible violation of Colorado's regulation 43 On-Site Waste Water Treatment Act and Lincoln County Health Department regulations.

Corrective Action: Immediately cease and desist sewage discharge from sanitary facilities. Immediately remove and properly dispose sewage from location. Soils will require removal and proper disposal, or cleaning/remediation. A corrective action date of 8/6/2018 is being provided as this is the SPUD date. **Sewage and soil put in proper sewage containment** Date: 08/06/2018



Picture 41 Chemical has Ben picked up and disposed at the Lincoln co land fill receipt will follow



Pictures 34-37 shows all waist picked up and disposed of



Waste Manifest			
Waste Generator: WWR Drilling, LLC 239 South 6th Street Independence, MO 67172 785-836-8762		Location: H000010_1_3 Date: 8/22/2018 Operator: Grant Mena	
Site: WWR Drilling, LLC_Hg_H00 LAT: 38.37750, Longitude: -93.531400 Lincoln County Colorado		Destination: WWR Drilling, LLC_Hg_H00 LAT: 38.37750, Longitude: -93.531400 Lincoln County Colorado	
Waste Description	Quantity	Unit of Measure	Weight
Domestic Sewage/Soil	1.00	5 Gallon Bucket	Approximately 67 LBS
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Notes:			Approximate Total Weight:
Waste was placed into 2 plastic bags and a 5 gallon bucket for transfer into the on-site storage tank for removal from location.			134.00 LBS

Comment It does not appear as though sufficient topsoil salvage on the location has been conducted.

Corrective Action Provide total cubic yards of topsoil salvaged and stored on this location.

Date 08/24/2018

1002c. PROTECTION OF SOILS Fail

Comment Topsoil salvaged from location, and topsoil stockpile appears that it is being used as a stormwater berm (although not compacted). This is not protective of topsoils due to risk of mixing with other subsoil horizons, and risk of being transported off location and stormwater sediment. See stormwater for additional comments regarding topsoil used in BMPs.- Topsoil is saved on top and back of berm as to restore location with quality topsoil

Corrective Action Separate, store and identify topsoil in accordance to COGCC 1000 series rules. A corrective

Date 07/25/2018

action date of 7/25/2018 is being used based on the Form 42, document 401710401, notice of construction.



SEE "COGCC COMMENTS" FOR COMMENT REGARDING DRILLING PIT

Corrective
Action

Provide chemical inventory, in a readily reviewable/accessible format (such as a PDF file, excel, etc....) of any chemical products brought to the well site for use downhole during drilling by 8/27/2018

Based on the review of the inventory, additional testing may be required for drilling pit closure. All MSDS (SDS) are attached.

