

**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:

09/05/2018

Submitted Date:

09/06/2018

Document Number:

682403970

FIELD INSPECTION FORM

Loc ID 318510 Inspector Name: Binschus, Chris 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: 39560
Name of Operator: TOP OPERATING COMPANY
Address: 3609 S WADSWORTH BLVD STE 340
City: LAKEWOOD State: CO Zip: 80235

Findings:

- 6 Number of Comments
- 1 Number of Corrective Actions
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
HERRING, PAUL	(303) 727-9915	paul.herring@topoperating.com	
		Mimi.Larsen@coag.gov	Assistant Attorney General
		dnr_cogccenforcement@state.co.us	COGCC Enforcement
HERRING, MURRAY J	(303) 727-9915 x203	murray.herring@topoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
318510	LOCATION	CL			-	EWING-62N67W 25SESW	RI

General Comment:

This is a follow-up Final Reclamation Inspection to Document #681901494- last inspected on 10/3/2016. Well was plugged and abandoned on 8/28/2015. Any corrective actions from previous inspections that have not been addressed are still applicable. Where corrective actions from the previous inspection report remain unresolved, corrective action dates remain unchanged.

Inspected Facilities

Facility ID: 318510 Type: LOCATION API Number: - Status: CL 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 _____ Contoured _____ Culverts removed _____

Gravel removed _____

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

Compaction alleviation _____ 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:

The previous inspection on 10/3/2016 documented that tubing (pipe) was on location.

On September 5, 2018, the surface owner did not want COGCC staff to inspect the location because an agreement was previously made with the Operator to not reclaim the location for the pipe. COGCC staff did use aerial imagery to document the status. Based on aerial imagery from 2017, the location has not been reclaimed and the surface owner is using it as a storage area. Based on the well file, the Operator has failed to submit a 502.b. Surface Owner Variance request.

Corrective Action: Properly submit a 502.b. Surface Owner Variance request using the Rule 1001.c. Reclamation Variance Guidance document.

Date **10/03/2016**

Overall Final Reclamation **Fail** Well Release on Active Location Multi-Well Location

COGCC Comments

Comment	User	Date
Please note that until a proper variance request has been submitted, the corrective action and date remain applicable. Until an official request has been submitted, COGCC will continue with business as usual, including follow-up inspections. Also, be aware that a submission for a variance request does not guarantee approval; corrective action and date would remain applicable until resolved if request is denied.	binschusc	09/06/2018
Operator falsely submitted a Final Reclamation Complete Notice on 11/6/2015 (Doc. #400932848).	binschusc	09/06/2018

Attached Documents

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

Document Num	Description	URL
682403971	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572350