

**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: LAKWOOD 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
		Mimi.Larsen@coag.gov	<a href="#">Assistant Attorney General</a>
HERRING, MURRAY J	(303) 727-9915 x203	murray.herring@topoperating.com	
		dnr_cogccenforcement@state.co.us	<a href="#">COGCC Enforcement</a>
HERRING, PAUL	(303) 727-9915	paul.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:

	<p>The previous inspection on 10/3/2016 documented that tubing (pipe) was on location.</p> <p>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.</p>	
Corrective Action:	<p>Properly submit a 502.b. Surface Owner Variance request using the Rule 1001.c. Reclamation Variance Guidance document.</p>	Date <b>10/03/2016</b>
Overall Final Reclamation	<b>Fail</b>	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

**COGCC Comments**

Comment	User	Date
Operator falsely submitted a Final Reclamation Complete Notice on 11/6/2015 (Doc. #400932848).	binschusc	09/06/2018
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

**Attached Documents**

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

Document Num	Description	URL
401756201	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572354">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572354</a>
682403971	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572350">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572350</a>