

**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:

09/20/2018

Submitted Date:

09/21/2018

Document Number:

682503911

FIELD INSPECTION FORM

Loc ID 313873 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: 79905
 Name of Operator: SMITH OIL PROPERTIES INC
 Address: PO BOX 219
 City: BYERS State: CO Zip: 80103

Findings:
5 Number of Comments
2 Number of Corrective Actions
 Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
		smithoilprop@aol.com	
Adamczyk, Megan		megan.adamczyk@state.co.us	
		smithoilprop@gmail.com	
		thebanditjimmy@yahoo.com	
Axelson, John		john.axelson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
226642	WELL	SI	06/01/2017	GW	087-07380	J. A. FARMS 1	RI

General Comment:

This is a final reclamation and stormwater inspection. This inspection is also in response to complaint #200446278.

On September 18, 2018 the Surface Owner (Complainant) submitted a formal complaint to the COGCC with concerns regarding equipment remaining on the location, condition of the access road, remaining pits, as well as issues regarding remediation of the pits/spills on site (contaminated soils), and reclamation.

On September 21, 2018 at 0821 hours, Northeast Reclamation Specialist (RS) Trujillo contacted the complainant via phone to discuss concerns and issues identified within the complaint. At 0900 hours, RS Trujillo and COGCC East Environmental Supervisor John Axelson met with the complainant on the location. Issues were identified regarding reclamation, stormwater and remediation on the location and access road.

For the purpose of this inspection, please refer to the "Reclamation" and "Stormwater" section of this report. A second FIR will be submitted for this location by Environmental to address issues regarding pits, E&P waste and contaminated soils.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

Inspected Facilities

Facility ID: 226642 Type: WELL API Number: 087-07380 Status: SI 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 _____ Pit mouse/rat holes, cellars backfilled **Fail**

Debris removed **Fail** No disturbance /Location never built _____

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

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control **Fail**

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** 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>Operator submitted 6(s) #401418630 stating well was plugged 8/15/2017. All reclamation should have been completed by 8/15/2018 in accordance with 1004.a. This location does not meet reclamation requirements; various production equipment, trash and debris have not been removed from the well site. Pits on location have not been closed or reclaimed. Gravel remains on battery location. Noxious weeds (Scotch Thistle) evident on well location and pit. The north/south section of the access road has not been reclaimed, and no maintenance has occurred on the east/west section of the access road.</p> <p>Unable to find evidence that reclamation activities in accordance with 1004.a have been conducted on the location.</p>	
Corrective Action:	SEE "COGCC COMMENTS" FOR CORRECTIVE ACTION REGARDING FINAL RECLAMATION.	Date 11/15/2017
Overall Final Reclamation	Fail	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
	Fail		Fail		Fail	

Comment: Operator appears to have implemented wattle BMPs on the west of the well. BMPs have not been maintained and are no longer in proper functioning conduction. Wattles are now considered debris and will need to be removed (see reclamation). Erosion degradation and stabilization concerns exist on the east/west section of access road. Ongoing maintenance has not occurred.

The North/South section of the access road requires complete reclamation (refer to reclamation).

Corrective Action: Perform maintenance on the east/west section of access road. Install or repair required BMPs per Rule 1002.f. Ongoing maintenance will be required until final reclamation has passed. A corrective action based on the date of the inspection is being provided as on-going maintenance should have been occurring.

Date: 09/20/2018

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
As part of the final reclamation requirements the following corrective action is mandatory - Immediately upon completion of the pit closures, spills clean ups and any required remediation for the location, the Operator is required to collect and test soil samples from the disturbances (pit/spill areas, well location, battery location), and sample from a reference area. At least one discrete sample shall be collected from the areas of concern as listed above at two depths 0-6" and 6"-12" with a minimum 6 samples. Additionally, two discrete soil samples will be collected at the two depths in the reference area for comparative agronomic soil analysis. At a minimum the following; analytes and analysis to be tested for include; pH (saturated paste), electrical conductivity (EC), Sodium Evaluation (SAR), organic matter, nitrate-nitrogen, Ammonium nitrate, phosphorus, potassium, zinc, iron, manganese, copper, sulfate, sulfur, lime estimate, % Calcium carbonate percentage, and soil texture. Report the results attached to a form 4, and provide aerial figure showing the sample locations with the GPS coordinates, to the attention of the COGCC Reclamation specialist Aaron Trujillo. If the agronomic samples show the soil is not conducive to vegetation establishment then provide a detailed soil amendment program to ameliorate the soil deficiencies	trujilloam	09/21/2018

<p>FINAL RECLAMATION- CORRECTIVE ACTION</p> <p>Perform reclamation in accordance with COGCC 1000 series rules including, but not limited to, removal of equipment, gravel and various trash debris, 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 on the location, access road and adjacent areas where various spills and stormwater runoff caused degradation. 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. A corrective action date of 8/15/2018 is being provided as reclamation should have been conducted within twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities.</p>	<p>trujilloam</p>	<p>09/21/2018</p>
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Attached Documents

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

Document Num	Description	URL
401771490	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4585671
682503912	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4585661