

**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:

03/08/2019

Submitted Date:

03/11/2019

Document Number:

682504576

FIELD INSPECTION FORM

Loc ID 447902	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 20 Number of Comments 1 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: 10670 Name of Operator: MALLARD EXPLORATION LLC Address: 1400 16TH STREET SUITE 300 City: DENVER State: CO Zip: 80202				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:			
Contact Name	Phone	Email	Comment
DYK, DUSTIN	(720) 543-7954	ddyk@mallardexploration.com	ALL INSPECTIONS
		emathews@mallardexploration.com	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:							
Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
447900	WELL	PR	06/29/2018		123-43663	Shull Fed 31-32-2HC	RI
447901	WELL	PR	06/29/2018	OW	123-43664	Shull Fed 31-32-1HN	RI
447903	WELL	XX	09/29/2016		123-43665	Shull Fed 9-59-31-2124CE2	RI
447904	WELL	XX	09/29/2016		123-43666	Shull Fed 9-59-31-0508CDE	RI
447905	WELL	XX	09/29/2016		123-43667	Shull Fed 9-59-31-1209AE	RI
447906	WELL	XX	02/08/2018		123-43668	Shull Fed 31-32-4HN	RI
447907	WELL	XX	09/29/2016		123-43669	Shull Fed 9-59-31-2124BE	RI
447908	WELL	XX	02/08/2018		123-43670	Shull Fed 31-32-3HN	RI

General Comment:

This is an inteirm reclamation and stormwater inspection in response to a 502.b delayed interim reclamation variance request.

Operator submitted doc. #401809954 on 10/25/2018 requesting that interim reclamation be delayed for a duration not to exceed 5 years.

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 operator guidance document.

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.

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

Location Construction

Location ID: 447902 CDP: _____

Comment: A disturbance area of 10.6 acres was mapped on 03/08/2019; this appears to exceed the approved Form 2A for the permitted disturbance area (10.14 acres).

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment:

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment:

Corrective Action: _____ Date: _____

Comment:

Corrective Action:

Date: _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities

Facility ID: <u>447900</u>	Type: <u>WELL</u>	API Number: <u>123-43663</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447901</u>	Type: <u>WELL</u>	API Number: <u>123-43664</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447903</u>	Type: <u>WELL</u>	API Number: <u>123-43665</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447904</u>	Type: <u>WELL</u>	API Number: <u>123-43666</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447905</u>	Type: <u>WELL</u>	API Number: <u>123-43667</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447906</u>	Type: <u>WELL</u>	API Number: <u>123-43668</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447907</u>	Type: <u>WELL</u>	API Number: <u>123-43669</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447908</u>	Type: <u>WELL</u>	API Number: <u>123-43670</u>	Status: <u>XX</u>	Insp. Status: <u>RI</u>

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 _____ Pass _____

Comment [Fencing along perimeter of location.](#)

Corrective Action _____ Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____ Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment [Rule 1002.c. requires that all stockpiled soils are protected from degradation due to water erosion.](#)

[Stormwater erosion degradation evident on soil stockpiles. See "Stormwater" and attached photo documentation.](#)

Corrective Action _____ Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment [An ATV, or similar sized vehicle, appears to have been traveling upon the slopes of the location and ditch BMP on the north end of the location. Vehicle operating off pad may be contributing to erosion degradation observed on slopes.](#)

[This does not comply with surface disturbance minimization.](#)

Corrective Action _____ Date _____

1003a. Waste and Debris removed? _____ Pass _____

Comment [No waste or debris found on location or reclamation area](#)

Corrective Action _____ Date _____

Unused or unneeded equipment onsite? _____ Pass _____

Comment [No unused/unneeded equipment/materials found being stored on location or reclamation area.](#)

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 ? Fail
- 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 REVEGETATIONCropland

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

This inspection is in response to a 502.b variance request for delayed reclamation. 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 operator guidance document.

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 _____

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: _____

Corrective Action: _____

Date _____

Overall Final Reclamation _____	Well Release on Active Location <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>
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Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Sediment Traps	Fail					Trap on SE end of pad, inlet
Berms	Fail					Berms @ ditch
Gravel	Pass	Tracking Pad	Pass			Cattle guard @ entrance
Slope Roughening	Fail					Traking. Slopes on pad
Check Dams	Pass					Velocity checks- large aggregate only used.
Hydro Mulch	Fail					@ topsoil stockpile
Ditches	Fail					Perimeter ditch
Sediment Traps	Fail					Trap on SW end of pad, appears insufficient

Comment: Stormwater erosion degradation concerns evident throughout location. Stormwater ditch on the south end of the location has failed, active stormwater discharge occurring. See photo 17 and 27 in the attached photo document.

Due to the active discharge, an immediate corrective action date of 3/8/2019 is being provided to address stormwater issues at ditch. At approximately 14:16 hours on 3/08/2019, Reclamation Specialist got in contact with Erin Mathews with Mallard Exploration via phone. Miss Mathews was notified of the concerns and the shortened CA date.

SEE COGCC COMMENTS FOR ADDITIONAL COMMENTS AND CORRECTIVE ACTIONS REGARDING STORMWATER

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f.

Date: 03/08/2019

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
<p>STORMWATER COMMENT (ONE OF TWO)</p> <p>DITCH AND BERM Inspection #682403198 dated 1/09/2018 documented that portions of the ditch BMP do not appear to have been properly constructed (insufficient depth). Stormwater ditch has filled with sediment and is not in proper functioning condition. Stormwater has eroded and breached the berm along the ditch on the south end of the location and active stormwater discharge is occurring. See "Stormwater" section of this report regarding active discharge.</p> <p>TRACKING/MULCHING Stormwater erosion (rill/gully) evident on the cut slopes of the pad on the north end of the location, the soil stockpiles on the east end of the location, and the fill slopes on the south end of the location.</p> <p>SEDIMENT TRAPS Inspection #682403198 dated 1/09/2018 documented that sediment traps may require maintenance as sediment accumulation is evident. Sediment trap on the southeast corner of the location currently inundated with water. Inlet at trap is no longer in proper functioning condition; inlet appears to have been "blown out", or filled with sediment. Sediment trap on the southwest corner of the location appears to have filled with sediment.</p> <p>CORRECTIVE ACTION: Install or repair required BMPs per Rule 1002.f by 4/11/2019</p>	trujilloam	03/11/2019

STORMWATER COMMENT (TWO OF TWO)- PERIMETER CONTROLS

trujilloam

03/11/2019

It does not appear that the perimeter stormwater and erosion controls installed on location are sufficient to mitigate stormwater runoff from the 10.6 acre location; ditches and berms do not appear to be appropriate in size (insufficient depth). The two (2) sediment traps on the southeast and southwest corners of the location also do not appear to be sufficient in size for the location; trap on the southwest end appears to be ~6-8 feet in length/width and ~1 foot in depth. Photos from inspection #682403198 suggest trap on the southeast end is similar in size.

CORRECTIVE ACTION:

If the Operator believes sufficient BMPs have been installed, then provide calculations from the site specific stormwater plan demonstrating that the installed BMPs are sufficient to prevent sediment laden storm runoff from leaving the 10.6 acre location.

If the operator determines that the current BMPs are insufficient, provide a site specific stormwater plan with specifications for controls that will be installed in order to bring location into compliance with Rule 1002.f(2).

Operator will be required to submit the stormwater plan via a Form 4 by 3/25/2019.

The installation and/or repair of stormwater and erosion control BMPs in accordance with good engineering practices are required by 4/11/2019 per the above corrective actions.

Attached Documents

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

Document Num	Description	URL
682504577	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4759506