

**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:

03/12/2019

Document Number:

682504582**FIELD INSPECTION FORM**

Loc ID 452871	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <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  <b>Findings:</b> 16 Number of Comments 5 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
<b>Operator Information:</b> OGCC Operator Number: <u>10661</u> Name of Operator: <u>BISON OIL &amp; GAS II LLC</u> Address: <u>518 17TH STREET #1800</u> City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>				<b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

<b>Contact Information:</b>			
Contact Name	Phone	Email	Comment
		aakers@bisonog.com	
Arthur, Denise		denise.arthur@state.co.us	
O&G, Bison	720-644-6997	ops@bisonog.com	All inspections

<b>Inspected Facilities:</b>							
Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
452981	WELL	PR	02/14/2018	OW	123-45842	Castor 8-59 19-24-12	RI
452982	WELL	XX	11/09/2017		123-45843	Castor Fed 8-59 19-24-5	ND
452983	WELL	XX	11/09/2017		123-45844	Castor 8-59 19-24-11	ND
452984	WELL	XX	11/09/2017		123-45845	Castor Fed 8-59 19-24-8	ND
452985	WELL	XX	11/09/2017		123-45846	Castor Fed 8-59 19-24-1	ND
452986	WELL	XX	11/09/2017		123-45847	Castor Fed 8-59 19-24-2	ND
452987	WELL	XX	11/09/2017		123-45848	Castor Fed 8-59 19-24-6	ND
452988	WELL	XX	11/09/2017		123-45849	Castor 8-59 19-24-9	ND
452989	WELL	XX	11/09/2017		123-45850	Castor Fed 8-59 19-24-4	ND
452990	WELL	XX	11/09/2017		123-45851	Castor Fed 8-59 19-24-7	ND
452991	WELL	XX	11/09/2017		123-45852	Castor Fed 8-59 19-24-3	ND
452992	WELL	XX	11/09/2017		123-45853	Castor 8-59 19-24-14	ND
452993	WELL	XX	11/09/2017		123-45854	Castor 8-59 19-24-15	ND
452994	WELL	PR	02/14/2018	OW	123-45855	Castor 8-59 19-24-16	RI
452995	WELL	XX	11/09/2017		123-45856	Castor 8-59 19-24-13	ND
452996	WELL	XX	11/09/2017		123-45857	Castor 8-59 19-24-10	ND

<b>General Comment:</b>

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

Operator submitted doc. #401844836 on 12/11/2018 requesting that interim reclamation be delayed for a duration not to exceed two (2) 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**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	Two (2) 300 gallon tanks stored on the southeast corner of the location are insufficiently stored in accordance with good housekeeping and 1002.f(2).B; Insufficient secondary containment.		
Corrective Action:	Properly store materials in accordance with good housekeeping and proper materials management.	Date:	03/26/2019

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

### Location Construction

Location ID: 452871 CDP: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: A disturbance area of 14.5 acres was mapped on 03/08/2019 via Trimble Juno 3B unit; this EXCEEDS the approved Form 2A for the permitted disturbance area of 12.2 acres.

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>452981</u>	Type: <u>WELL</u>	API Number: <u>123-45842</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>452982</u>	Type: <u>WELL</u>	API Number: <u>123-45843</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452983</u>	Type: <u>WELL</u>	API Number: <u>123-45844</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452984</u>	Type: <u>WELL</u>	API Number: <u>123-45845</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452985</u>	Type: <u>WELL</u>	API Number: <u>123-45846</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452986</u>	Type: <u>WELL</u>	API Number: <u>123-45847</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452987</u>	Type: <u>WELL</u>	API Number: <u>123-45848</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452988</u>	Type: <u>WELL</u>	API Number: <u>123-45849</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452989</u>	Type: <u>WELL</u>	API Number: <u>123-45850</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452990</u>	Type: <u>WELL</u>	API Number: <u>123-45851</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452991</u>	Type: <u>WELL</u>	API Number: <u>123-45852</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452992</u>	Type: <u>WELL</u>	API Number: <u>123-45853</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452993</u>	Type: <u>WELL</u>	API Number: <u>123-45854</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452994</u>	Type: <u>WELL</u>	API Number: <u>123-45855</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>452995</u>	Type: <u>WELL</u>	API Number: <u>123-45856</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>452996</u>	Type: <u>WELL</u>	API Number: <u>123-45857</u>	Status: <u>XX</u>	Insp. Status: <u>ND</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 \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND  
SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS **Fail** \_\_\_\_\_

Comment \_\_\_\_\_

Rule 1002.c requires operators to implement best management practices to prevent weed establishment on all stockpiled soils. Operator has allowed undesirable weedy plant species such as Salsola sp. to establish on the topsoil stockpile on the south end of the location.

Corrective Action \_\_\_\_\_

Conduct weed management and comply with Rule 1002.c.

Date **04/12/2019**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? **Fail** \_\_\_\_\_

Comment \_\_\_\_\_

Various trash debris (boxes w/ material, pallet) observed on the interim areas on the east end of the location.

Corrective Action \_\_\_\_\_

Comply with 603.f "good housekeeping" and 1003a. Remove and properly store or dispose of trash and debris from location.

Date **04/12/2019**

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 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 <input type="checkbox"/>		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Berms	Fail					SW of location, insufficient discharge point.
Sediment Traps	In Process					Two sediment traps on NW/NE corners of location
Berms	Pass					Berms along northern perimeter of location
				Material Handling And Spill Prevention	Fail	2- 300 ga tanks of lubricant, SE corner of pad
Gravel	Pass					Gravel along northern perimeter of location
Comment:		<p>It does not appear that the perimeter stormwater and erosion controls installed on location are sufficient to mitigate stormwater runoff from the 14.5 acre disturbance.</p> <p>See "COGCC Comments" for additional comments regarding stormwater.</p> <p>See "Good Housekeeping" for comments regarding "Material Handling and Spill Prevention".</p>				
Corrective Action:		<p>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 location.</p> <p>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).</p> <p>Operator will be required to submit the stormwater plan via a Form 4 by 3/26/2019.</p> <p>The installation and/or repair of stormwater and erosion control BMPs in accordance with good engineering practices are required by 4/12/2019</p>				
		Date: 03/26/2019				
<b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
Cut slopes on the south end of the location is predominantly bare and exposed soil. Aeolian deposition on the slopes evident and appear to have covered any vegetation that has germinated. Stormwater erosion degradation is becoming evident.	trujilloam	03/12/2019
Shallow berm on the southwest end of the location travels north ~200 feet then ends. There does not appear to be sufficient stormwater and erosion control BMPs at the end of berm to mitigate erosion degradation and sediment laden free stormwater discharge from location.	trujilloam	03/12/2019
Stormwater and erosion control BMPs do not appear to be sufficient, or missing at and along the perimeter of the topsoil stockpile on the south end of the location.	trujilloam	03/12/2019
Soil stockpile predominantly undesirable weedy plant species, or bare and exposed soil.		
Operator has installed two (2) traps on the location. Sediment traps do not appear sufficient in size to mitigate stormwater runoff from the location.	trujilloam	03/12/2019
Operator appears to have ripped the slopes within and around the sediment trap on the northwest corner of the location. Ripping has been conducted with the contour of the slope, rather than along; Ripping has been installed in such a manner to facilitate stormwater erosion degradation (concentrating flows, promoting rill and gully formations) rather than mitigate it. This is not good engineering practice or stormwater management.		



**Attached Documents**

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

Document Num	Description	URL
682504583	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760862">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760862</a>
682504585	Mapped Disturbance Area	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760865">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760865</a>