

**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:

682504584

FIELD INSPECTION FORM

Loc ID 454166 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: 10661
Name of Operator: BISON OIL & GAS II LLC
Address: 518 17TH STREET #1800
City: DENVER State: CO Zip: 80202

Findings:

- 20 Number of Comments
- 5 Number of Corrective Actions
- Corrective Action Response Requested

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
		ops@bisonog.com	
		denise.arthur@state.co.us	
		aakers@bisonog.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
454217	WELL	XX	03/06/2018		123-46457	Hunt 8-60 6C-5-8	ND
454218	WELL	XX	03/06/2018		123-46458	Hunt 8-60 6C-5-3	ND
454219	WELL	PR	07/01/2018		123-46459	Hunt 8-60 6C-5-10	RI
454220	WELL	PR	07/01/2018		123-46460	Hunt 8-60 6C-5-6	RI
454221	WELL	XX	03/06/2018		123-46461	Hunt 8-60 6C-5-1	ND
454222	WELL	XX	03/06/2018		123-46462	Hunt 8-60 6C-5-7	ND
454223	WELL	XX	03/06/2018		123-46463	Hunt 8-60 6C-5-5	ND
454224	WELL	XX	03/06/2018		123-46464	Hunt 8-60 6C-5-2	ND
454225	WELL	XX	03/06/2018		123-46465	Hunt 8-60 6C-5-9	ND
454226	WELL	XX	03/06/2018		123-46466	Hunt 8-60 6C-5-4	ND

General Comment:

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

Operator submitted doc. #401844836 on 01/07/2019 requesting that interim reclamation be delayed for a duration not to exceed five (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

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	Various containers (barrel, paint can, 5 gallon buckets, jugs) observed being stored directly up the soil surface. This is improper materials management. See photos 44, 46-48		
Corrective Action:	Comply with 603.f and 1002.f(2).b and place materials into secondary containment, or remove and properly store.	Date:	03/22/2019
Type	TRASH		
Comment:	Various trash debris (cans, bottles, plastic jug) observed throughout perimeter of the location. See photos 51-53		
Corrective Action:	Comply with Rule 603.f .	Date:	03/22/2019

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date: <input type="text"/>

Paint

Condition	<input type="text"/>
Other (Content)	<input type="text"/>
Other (Capacity)	<input type="text"/>
Other (Type)	<input type="text"/>

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
		Walls Insufficient		Inadequate
Comment:	<p>THIS IS TO ADDRESS STORMWATER ISSUES IDENTIFIED AT THE CONTAMINATED SOIL STOCKPILE ON THE NE CORNER OF PAD</p> <p>Operator is storing contaminated soils on the northeast corner of the pad. Containment BMPs are insufficient as pollutant discharge from the contaminated soils is evident. See photos 41-43</p>			
Corrective Action:	Install or repair BMPs to prevent pollutant discharge from contaminated soil stockpile by 3/15/2019			Date: 03/15/2019

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 454166 CDP: _____

Comment: A disturbance area of 11 acres was mapped on 03/08/2019 via Trimble Juno 3B unit; this appears to be in compliance with the approved Form 2A for the permitted disturbance area.

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>454217</u>	Type: <u>WELL</u>	API Number: <u>123-46457</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454218</u>	Type: <u>WELL</u>	API Number: <u>123-46458</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454219</u>	Type: <u>WELL</u>	API Number: <u>123-46459</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>454220</u>	Type: <u>WELL</u>	API Number: <u>123-46460</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>454221</u>	Type: <u>WELL</u>	API Number: <u>123-46461</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454222</u>	Type: <u>WELL</u>	API Number: <u>123-46462</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454223</u>	Type: <u>WELL</u>	API Number: <u>123-46463</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454224</u>	Type: <u>WELL</u>	API Number: <u>123-46464</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454225</u>	Type: <u>WELL</u>	API Number: <u>123-46465</u>	Status: <u>XX</u>	Insp. Status: <u>ND</u>
Facility ID: <u>454226</u>	Type: <u>WELL</u>	API Number: <u>123-46466</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. Additionally All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion. Operator has allowed undesirable weedy plant species such as Salsola sp. to establish on the topsoil stockpile on the south end of the location. Soils do not appear to be sufficiently stabilized and erosion degradation is evident (See Stormwater)**

Corrective Action **Conduct weed management and comply with Rule 1002.c.**

Date **04/12/2019**

1002E. SURFACE DISTURBANCE MINIMIZATION **Fail** _____

Comment **Inspector observed areas along the perimeter of the location where vehicles have traveled over and damaged the perimeter stormwater ditch. This does not comply with 1002.e**

Corrective Action _____

Date _____

1003a. Waste and Debris removed? **Fail** _____

Comment **Various trash debris observed throughout slopes and perimeter of the of the location. See "Good Housekeeping"**

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 ? 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 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 _____

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
				Material Handling And Spill Prevention	Pass	Porta-john secured
				Material Handling And Spill Prevention	Fail	Buckets/barrel/etc. w/out secondary containment
Sediment Traps	Fail					Erosion, appear insufficient.
Tackifiers	Fail					Slopes and topsoil stockpile
Ditches	Fail					Appear insufficient. Filled with sediment
				Material Handling And Spill Prevention	Fail	BMPs/Containment around mobile tanks
				Material Handling And Spill Prevention	Fail	BMPs/Containment at contaminated soils
Hydro Mulch	Fail					Slopes and topsoil stockpile
Other	Fail					Slope Stabilization

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER](#)

Corrective Action: **Install and repair stormwater and erosion control BMPs in accordance with good engineering practices and 1002.f by 4/12/2019**

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.

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 3/26/2019.

Date: 03/26/2019

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>SEDIMENT TRAPS</p> <p>It does not appear that the perimeter stormwater and erosion controls installed on location are sufficient to mitigate stormwater runoff from the 11 acre disturbance; The two (2) sediment traps on the northeast and northern ends of the location also do not appear to be sufficient in size for the location.</p> <p>Sediment traps do not appear to have been constructed in accordance with good engineering practices; insufficient inlet and slope protection. Stormwater has incised the ditch at the inlets of the sediment traps. Slopes of the traps do not appear to have been constructed at an advisable grade in accordance with good engineering practices; stormwater erosion degradation evident along the slopes of the sediment traps.</p> <p>DITCH</p> <p>Ditches do not appear to have been constructed in accordance with good engineering practices and/or have filled with sediment. Additionally, it appears operator has installed rip-rap on areas of the ditch on the southeastern end of the location. It is unclear if these areas were intended to be a sediment trap to allow for sediment laden free sediment discharge. These areas have also filled with sediment.</p> <p>There are areas of the ditch on the north and east end of the location where vehicles appear to have traveled over and damaged the BMP.</p> <p>TOPSOIL STOCKPILE</p> <p>The topsoil stockpile on the south end of the location is predominantly bare and exposed soil, or vegetated by undesirable weedy plant species such as Salsola sp. (See 1003.a under reclamation). Operator appears to have used a tackifier on the stockpile, however BMP has not been maintained and erosion degradation is evident.</p> <p>SLOPES</p> <p>Rill and gully erosion degradation evident on the slopes of the eastern perimeter of the pad. Sediment deposition evident on slopes to the south of the pad. Operator appears to have used a tackifier on slopes, however BMP has not been maintained; Slopes are predominantly bare and exposed soil, or vegetated by undesirable weedy plant species such as Salsola sp. Slopes are not sufficiently stabilized.</p> <p>SECONDARY CONTAINMENT AT TANKS</p> <p>Secondary containment around the two mobile tanks on located at center of the pad are not in proper functioning condition. See photos 45-46.</p> <p>CONTAMINATED SOILS</p> <p>Operator is storing contaminated soils on the northeast corner of the pad. Containment BMPs are insufficient as pollutant discharge from the contaminated soils is evident. SEE THE "TANKS AND BERMS" SECTION OF THIS REPORT</p>	trujilloam	03/12/2019

Attached Documents

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

Document Num	Description	URL
682504586	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760868
682504587	Disturbance Area	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4760872