

On 08/20/2019, Reclamation Specialist Trujillo conducted a follow-up construction and stormwater inspection at Bison Oil and Gas' Hunt 8-60 location in Weld County, Colorado.

This inspection is a follow-up to inspection #682504584 dated 3/8/2019.

This inspection is also a follow-up inspection to FIR Resolution form #402030947 submitted 05/13/2019 by Operator stating corrective actions from inspection #682504584 are complete.

This inspection is also in regards to Sundry doc. #401844836 requesting a 502.b delayed interim reclamation variance for a duration not to exceed five (5) years

This inspection is to document compliance for the following corrective actions:

603.f/1002.f.(2).b: Proper materials management
603.f: Trash debris
1002.c: Protection of Soils
1002.e: Surface disturbance minimization
1002.f: Install/Repair BMPs at contaminated soil stockpile
1002.f: Install/Repair BMPs at erosion degradation.

The following corrective actions appear to have been addressed:

603.f: Trash debris removed
1002.f: Contaminated soils removed

The following compliance issues were observed during this inspection:

210.d: Required signage missing at tanks at battery.
210.d(2): Labels not posted, or labelling illegible on barrels/containers.
603.f: Weed establishment on location and around equipment
603.f: Noxious weed management
603.f / 1002.f: Proper materials management. Barrels/containers observed on location without secondary containment.
1002.c: Weed establishment on topsoil pile. Stabilization BMPs
907.e / 1002.f: Stained soils observed around equipment and barrels outside of containment.
1002.f: Stormwater degradation on location. Insufficient stormwater and erosion control BMPs; BMPs not been installed in accordance with good engineering practices, and/or maintained in proper functioning condition. Sediment transport off location. Ponding at wells and location with vehicle tracking evident.

Refer to the "Location", "Reclamation", "Stormwater" and "COGCC Comments" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

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

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	It was observed that the required signs or labels (capacity, contents, NFPA, etc...) are not posted on tanks at the battery. See photos 47, 48.		
Corrective Action:	Install signage/labelling to comply with Rule 210.b.	Date:	09/21/2019
Type	CONTAINERS		
Comment:	It was observed that labels were not posted, or labelling illegible on barrels/containers on location; Unable to clearly identify contents. See photos 40, 51		
Corrective Action:	Install required signage/labelling on barrels/containers to comply with Rule 210.b	Date:	09/21/2019
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: _____
Good Housekeeping:			
Type	WEEDS		
Comment:	Weedy vegetative establishment observed on location, around equipment (wells), stormwater BMPs, etc... See photos 37, 38, 40, 45, 46 It was also observed that Field Bindweed (<i>Convolvulus arvensis</i>) is establishing on the southern slopes of the pad. This is a Colorado State listed noxious weed. See photo 12		
Corrective Action:	Comply with 603.f	Date:	09/21/2019
Type	OTHER		
Comment:	Stained soils were observed around equipment, and barrels outside of containment. This is a stormwater pollutant source. See photos 49-52		
Corrective Action:	Properly treat or dispose of oily waste in accordance with 907.e.	Date:	09/21/2019
Type	STORAGE OF SUPL		
Comment:	Inspection #682504584 observed containers being stored outside of secondary containment. Inspection required operator to comply with 603.f and 1002.f(2).b and place containers into secondary containment, or remove from location and properly store. Operator submitted resolution doc. #402030947 stating corrective action complete. It was observed in this inspection that barrels/containers remain stored on location without secondary containment. Spills from containers evident. See corrective above regarding stained soils. See photos 40, 50-52. Operator has failed to conduct ongoing and proper materials management. Original corrective action and date remain applicable.		
Corrective Action:	Comply with 603.f and 1002.f(2).b and place materials into secondary containment, or remove and properly store.	Date:	03/26/2019
Type	TRASH		
Comment:	Inspection #682504584 observed trash debris along perimeter of the location. Operator submitted resolution doc. #402030947 stating corrective action complete. Trash debris was not observed during this inspection. This corrective action appears to have been addressed.		
Corrective Action:			Date:
Overall Good: <input type="checkbox"/>			
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:

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
Comment: Inspection #682504584 observed that containment BMPs storing contaminated soils on the pad were insufficient, and required operator to install or repair BMPs. Operator submitted resolution doc. #402030947 stating corrective action complete (soils removed). It was observed in this inspection that the contaminated soils have been removed. This corrective action has been addressed.				
Corrective Action:				Date:

Venting:

Yes/No	<input type="text"/>
Comment:	<input type="text"/>
Corrective Action:	Date:

Flaring:

Type	<input type="text"/>
Comment:	<input type="text"/>
Corrective Action:	Date:

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 [Inspection #682504584](#) documented weed establishment, insufficient BMPs at topsoil and required operator to comply with 1002.c

[Operator submitted resolution doc. #402030947](#) stating corrective action complete.

 It was observed in this inspection that erosion degradation has been repaired on the northern side of the soil stockpile, and that stabilization BMPs (mulch) has been installed on the northern side, and the top of the soil stockpiles. Weed establishment was not observed on these areas.

 However, it was also observed that weedy vegetation has been allowed to establish on the southern end of the soil stockpile, and no BMPs have been installed in accordance with 1002.c. See photos 5, 6. This corrective action has not been addressed.

Corrective Action [Comply with 1002.c](#)

Date **04/12/2019**

1002E. SURFACE DISTURBANCE MINIMIZATION _____ In Process _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____ In _____

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 ? 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? _____ F _____

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 Multi-Well Location

Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Hydro Mulch	Fail					Slope stabilization
Sediment Traps	Fail					
Ditches	Fail					Perimeter ditch
Other	Fail					Slope stabilization
				Material Handling And Spill Prevention	In Process	Porta-john at risk due to erosion
Mulching	Fail					Slope stabilization
				Material Handling And Spill Prevention	Fail	barrels without secondary containment
Mulching	Pass					Cut slopes on west end of location.

Comment: Inspection #682504584 observed various stormwater issues and required operator to comply with 1002.f rules.
 Operator submitted resolution #402030947 stating CA complete.
 It was observed in this inspection that Operator has failed to conduct sufficient and ongoing stormwater management.
SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER
 Stormwater and erosion control BMPs are required to be installed in accordance with good engineering practices, and maintained in proper functioning condition at all times in accordance with 1002.f. Due to the significant nature, extent, or duration of this alleged rule violation, this location is being referred to enforcement.
 Original corrective action and date remains applicable.

Corrective Action: Comply with COGCC Stormwater Rules: Install or repair required BMPs per Rule 1002.f, and in accordance with good engineering practices.

Date: 03/26/2019

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>SLOPES</p> <p>Inspection #682504584 observed rill and gully erosion degradation on the slopes of the location, and required Operator to comply with 1002.f</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete.</p> <p>It was observed in this inspection that stormwater erosion remains evident, and has continued to further degrade the location. See photos 11, 14, 16-23, and 27-29.</p> <p>Operator has failed to conduct sufficient and ongoing stormwater monitoring and management in accordance with 1002.f</p>	trujilloam	08/21/2019

<p>PORTA-JOHN</p> <p>Erosion degradation on slopes is beginning to cut under the porta-john on the east end of the location. Erosion degradation is compromising the stabilization of the porta-john and may result in tipping and spilling contents. See photos 25, 26.</p>	<p>trujilloam</p>	<p>08/21/2019</p>
<p>SEDIMENT TRAPS</p> <p>Inspection #682504584 observed that the sediment traps on the perimeter of the location have not been installed in accordance with good engineering practices.</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete.</p> <p>It was observed in this inspection that sediment traps remain improperly constructed in accordance with good engineering practices:</p> <ul style="list-style-type: none"> - The outlet of the sediment trap on the north end of the location has been constructed at the same elevation as the adjacent ditch/berms, and will not allow for stormwater discharge. - Insufficient inlet outlet protection; Inlets/outlets insufficiently armored and are missing protections including, but not limited to, geotextile lining and rip-rap aggregate of appropriate sizes. - Weed establishment occurring at BMPs - Walls/berms at BMP insufficiently compacted/consolidated/stabilized. <p>See photos 7-9, 30, 31, and 33-36.</p>	<p>trujilloam</p>	<p>08/21/2019</p>
<p>DITCH</p> <p>Inspection #682504584 observed that the stormwater diversion ditches do not appear to have been constructed in accordance with good engineering practices and have filled with sediment. Inspection required operator to comply with 1002.f</p> <p>Operator submitted resolution doc. #402030947 stating corrective action complete</p> <p>It was observed in this inspection that the stormwater diversion ditches remain have not been constructed in accordance with good engineering practices, or maintained in a proper functioning condition:</p> <ul style="list-style-type: none"> -BMP remains insufficiently compacted/consolidated/stabilized. -Stormwater erosion degradation from slopes have filled ditch with sediment, with sediment laden stormwater discharge evident off of location. <p>See photos 15, 16, 22-24, 30, 32, and 39.</p> <p>Operator has failed to conduct sufficient and ongoing stormwater monitoring and management in accordance with 1002.f</p>	<p>trujilloam</p>	<p>08/21/2019</p>
<p>CULVERTS</p> <p>It was observed in this inspection that culverts along access road/location entrance missing sufficient inlet/outlet protection/armoring. See photos</p>	<p>trujilloam</p>	<p>08/21/2019</p>

<p>PONDING</p> <p>Evidence of stormwater ponding on pad, production areas and wells observed in this inspection. See photos 42-45.</p> <p>There does not appear to be sufficient stormwater controls with a stabilized outlet to mitigate ponding on the location, and to allow for sediment laden free stormwater discharge from the location in accordance with 1002.f and 1002.f.(3). Operator is required to Install stormwater BMPs to 1) mitigate ponding within the pad/production areas, 2) prevent potential industrial pollutant contact and 3) to allow for sediment laden-free stormwater discharge from the location</p>	<p>trujilloam</p>	<p>08/21/2019</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
696200613	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4915750