

**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:

10/17/2019

Submitted Date:

10/18/2019

Document Number:

697500736**FIELD INSPECTION FORM**
 Loc ID 323189 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10071Name of Operator: HIGHPOINT OPERATING CORPORATIONAddress: 555 17TH ST STE 3700City: DENVER State: CO Zip: 80202**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:3 Number of Comments1 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
Arthur, Denise		denise.arthur@state.co.us	
		bjames@hpres.com	
Kirschner, Steven		steven.kirschner@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
323189	LOCATION	CL			-	LOVELY-66N66W 9SESW	RI

General Comment:

This is a follow up Final Reclamation Inspection in response to the Operator's Field Inspection Report Resolution Form (FIRR Doc.#402206720).

Note: This location is currently under review with Enforcement; therefore, this inspection is being entered for notification and documentation only and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c.

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 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 _____

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 _____

Debris removed _____ No disturbance /Location never built _____

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

Gravel removed **Fail**

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

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

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

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:

COGCC staff, Chris Binschus and Denise Arthur, conducted this follow up inspection to confirm that the Operator did not use the Equestrian Grass Mix. Seeding performed in 2018 did not use the proper seed mixture to match the surrounding plant community. There was significant discrepancies between the information provided regarding the seed mixture stated within the NOAV response and the most recent FIRR corrective action complete notice submitted on 10-15-2019. Upon re-inspection of the location on 10-17-2019, the FIRR submitted on 10-15-2019, in response to Document# 697500656, with an attached seed tag is not accurate regarding the seed mixture that was actually planted in 2018. See the attached inspection photos for more details.

Corrective Action:

Comply with the Corrective Actions listed (#1-#8) within the COGCC Comments.

Date _____

There is no corrective action date because this is under review with Enforcement; however, COGCC staff would recommend conducting the corrective actions during the Fall seeding window before the winter.

Overall Final Reclamation

FailWell Release on Active Location ☐Multi-Well Location ☐**COGCC Comments**

Comment	User	Date
<p>Comply with the following Rule 1004.a. items regarding the tank battery:</p> <ol style="list-style-type: none"> 1) Remove the culvert that was installed during the construction of the additional access point and reestablish the vegetated ditch that existed prior to the construction along the eastern edge of the location toward Rd 70; 2) Recontour the location to pre-existing conditions and remove any remaining gravel; 3) Perform compaction alleviation by cross-ripping to a minimum depth of 18"; 4) Reseed with an approved surface owner seed mix (the "surface owner" equestrian grass mix attached to the most recent FIRR 10-15-2019 would appear to be an appropriate seed mixture to match the surrounding area); 5) Ensure erosion controls are implemented to stabilize the seeded soil; eg. Mulch. Continue to monitor and manage the stormwater per the appropriate timing; 6) Continue to monitor and manage this site at a minimum of 4 times during the growing season until the location meets Rule 1004 standard, including weed management; 7) Make the monitoring and management documents available to COGCC upon our request within two days; 8) Submit a Form 4 Final Reclamation Complete notice when the location meets Rule 1004 standards. 	binschusc	10/18/2019

Attached Documents

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

Document Num	Description	URL
697500737	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4967454