

**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:

03/24/2020

Submitted Date:

03/30/2020

Document Number:

693901585

FIELD INSPECTION FORM
 Loc ID: 325961
 Inspector Name: ROY, CATHERINE
 On-Site Inspection: ☐
 2A Doc Num:
Operator Information:

OGCC Operator Number: 10133

Name of Operator: HILCORP ENERGY COMPANY

Address: P O BOX 61229

City: HOUSTON State: TX Zip: 77208

Status Summary:

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

Findings:

5 Number of Comments

2 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
Ray, Mandy	(505) 599-4083	mray@hilcorp.com	All Inspections
Shorty, Priscilla		pshorty@hilcorp.com	All SW Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
215638	WELL	PA	04/12/2016	GW	067-07243	ALLISON UNIT 116	RI

General Comment:

On 3/24/2020 Catherine Roy conducted a reclamation and stormwater inspection. Document 401040408 describes plugging the well on 4/12/2016. During this inspection the following compliance issues were observed:

- Equipment needs to be removed.
- Revegetation needs to be conducted throughout the majority of the project area.
- Revegetation and weeds need to be monitored and managed by a qualified vegetation specialist, until passing final reclamation. Documentation of monitoring/management may be requested as part of this corrective action.
- Erosion and stormwater controls need to be installed until location is stabilized with desirable perennial vegetation.

Operator is directed to perform corrective actions outlined on this inspection report immediately. Doing so may decrease the duration of alleged violations and the penalties that may be assessed pursuant to Rule 523. Corrective action dates are not assigned as it is the expectation that the location be at or near completed final reclamation when inspection is conducted in response to Form 4 request for final reclamation.

This final reclamation inspection was conducted in response to the operator submitting official documents to imply or directly state that final reclamation is complete per a final reclamation inspection request and/or a bond release request. Upon inspection, it is evident that significant elements of final reclamation are not complete. Per COGCC rules, submission of falsified documentation can be considered an aggravating factor if, or when, enforcement actions are recommended.

See below, and attached photos for additional detail.

Inspected Facilities									
Facility ID:	215638	Type:	WELL	API Number:	067-07243	Status:	PA	Insp. Status:	RI

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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 _____

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 **Fail** _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** _____ 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: **Revegetation is failed within the project area as little desirable vegetation present over the majority of the well pad. A vegetation transect was conducted and identified no desirable vegetation along the transect. Dense Russian thistle present throughout the project area.**
Electrical equipment with exposed wiring observed within the southwestern project area.

Corrective Action:	<p>-Revegetation needs to be conducted throughout the majority of the project area. Revegetation needs to be monitored by qualified personnel, knowledgeable of revegetation, weeds, and stormwater, and managed as needed to ensure that revegetation is increasing. Documentation of monitoring may be requested. Livestock exclusion will likely be needed for successful revegetation.</p> <p>-Remove unused equipment.</p>	Date _____
Overall Final Reclamation <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: Erosional rilling and channeling is occurring on bare soils in the northern project area.						
Corrective Action: Erosion controls (ie: mulch, blankets, etc.) and stormwater controls (ie: BMPs) are needed throughout the project area until the location is stabilized with desirable perennial vegetation.						Date: _____
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
693901586	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110397
693901587	Transect Datasheet	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5110398