

**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:

05/13/2020

Submitted Date:

05/18/2020

Document Number:

696201286**FIELD INSPECTION FORM**Loc ID 311824 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 26155

Name of Operator: EAGLE OPERATING INC

Address: 2501 6TH ST SE STE B

City: MINOT State: ND Zip: 58701

Status Summary:

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

Findings:

4 Number of Comments

3 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
		bakke@rtc.coop	
		eagleop@yahoo.com	
		nkbrehkus@gmail.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
117203	PIT	AC			-	EMERALD "C" 125	RI
311824	LOCATION	AC			-	EMERALD-62N103W 36NESW	RI

General Comment:

On 5/13/2020, Reclamation Specialist Trujillo conducted a follow up final reclamation and stormwater inspection at Eagle Operating Inc's E-M Emerald 275 location in Rio Blanco County, Colorado.

This inspection is to document compliance for the following corrective actions from Field Inspection Report No. 696200978:

306.f: Storage of unused or unneeded equipment.

1003.b: Reclamation of areas disturbed due to equipment storage

911.f.(2): Pit Closure

It was observed in this inspection that corrective actions have not been addressed.

Refer to the "Reclamation" and "Pits" section 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.

Inspected Facilities								
Facility ID:	117203	Type:	PIT	API Number: -	Status:	AC	Insp. Status:	RI
Facility ID:	311824	Type:	LOCATION	API Number: -	Status:	AC	Insp. Status:	RI

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? Fail

Comment

It was observed in inspection No. 696200978 that Operator is storing three (3) pump jack units, four (4) tanks, and other unused equipment on off-Location areas west of the Emerald 275 well.

It was observed in this inspection that the three (3) pump units and various other trash debris and stored equipment has been removed, however, the four (4) AS-Tanks have not been removed per corrective actions.

Corrective action has not been addressed and remains applicable.

Corrective Action

Comply with 603.f and 1003.a; Remove and properly store unused/unneeded equipment, and remove and properly dispose debris.

Date **02/13/2020**

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? Fail 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? Fail
- 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

Inspection No. 696200978 required Operator to conduct reclamation on disturbance areas where Oil and Gas Equipment has been stored.

It was observed in this inspection that tank equipment has not been removed and areas reclaimed; No reclamation activities appear to have been conducted on areas where equipment was removed.

This corrective action has not been addressed and remains applicable.

Corrective Action

Conduct reclamation in accordance with Rule 1003.b, 1003.c and 1003.e.(2); Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation of the Location has passed.

Date 02/13/2020

Overall Interim Reclamation Fail

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 _____

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

Comment: _____

Corrective Action: _____

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PITType: _____ Lined: _____ Pit ID: 117203 Lat: 40.095731 Long: -108.908653

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: _____ Liner Condition: _____

Comment: _____

Corrective Action

Date: _____

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective

Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

Corrective

Date: _____

Anchor Trench Present: _____ Oil Accumulation: _____ 2+ feet Freeboard: _____

Comment:

Inspection No. 696200978 observed that the pit has not been closed in accordance with COGCC 900 series Rules. Inspection required Operator to submit a Form 27 demonstrating that the pit was closed per Rules.

No Form 27 for pit closure on file; Corrective action has not been addressed and will remain applicable until addressed in its entirety.

Pit remains out of compliance, however per COGCC West Environmental Protection Specialist, Operator is in the process of sampling and submitting the 27; The COGCC acknowledges that Operator is in process of resolving compliance issues.

Corrective Action

Submit a Form 27 demonstrating that the pit was closed per COGCC 900 series rules

Date: 03/13/2020**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
696201287	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5153059