

**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:

05/28/2020

Submitted Date:

06/01/2020

Document Number:

692402225

**FIELD INSPECTION FORM**

Loc ID 314168 Inspector Name: Colby, Lou On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 100321

Name of Operator: ROCKY MTN NATURAL GAS LLC ADBA BLACK HILLS

Address: 1515 ARAPAHOE ST TOWER 1

City: DENVER State: CO Zip: 80202

**Status Summary:**

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

**Findings:**

12 Number of Comments

8 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
Gross, Jason	970-876-9046	jason.gross@usda.gov	Surface
		jessicadonahue@summiteng.net	
Warnes, Thomas	970-406-1476	thomas.warnes@blackhillscorp.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465889	WELL	DG	07/23/2019		097-06016	Wolf Creek 9-D2	RI
465890	WELL	DG	07/23/2019		097-06017	Wolf Creek 9-D3	RI

**General Comment:**

This is an Interim Reclamation & Stormwater focused Inspection. Any Corrective Actions from previous Inspections that have not been addressed are still applicable.

This site, located in the White River National Forest in Pitkin County, was minimally expanded in 2019 to facilitate Drilling of two Storage Wells in the Wolf Creek Storage field. The existing Well on site was Plugged and Abandoned in 2018.

It is apparent there is more work to be completed at this site and that Winter conditions at this elevation (over 10,000ft) dictated delaying activities until 2020; however site was not cleaned up or properly stabilized for Winter as evidenced by CAs in this Inspection.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Various trash scattered over Location. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	STORAGE OF SUPL		
Comment:	Various Equipment not stored in a workman like manner. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f.	Date:	06/15/2020
Type	UNUSED EQUIPMENT		
Comment:	Various unused equipment scattered over Location. Also noting here, ends of rebar protruding from pad surface at East side of site posing a Safety hazard. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	DEBRIS		
Comment:	Various Debris scattered over Location. Refer to Photo Log attached.		
Corrective Action:	Comply with Rule 603.f	Date:	06/15/2020
Type	DEBRIS		
Comment:	There are slash/debris piles and down timber around perimeter of location. Operator should consult with Forest Service about mangement of this Debris.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Non reportable spills - stained soil/gravel in multiple areas of location. Refer to Photo Log attached.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a. Properly treat or dispose of oily waste in accordance with 907.e	Date:	07/01/2020

Overall Good: ☐**Spills:**

Type	Area	Volume		
Other				
Comment:	Cellars are over flowing with stormwater(oily sheen noted) creating potential for contamination of stormwater with Cellar/ wellhead pollutants. Refer to Photo Log attached.			
Corrective Action:	Properly treat or dispose of oily waste in accordance with 907.e.			Date: 06/15/2020

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type: Other	#		corrective date
Comment:	Open cellars of two Wells with no covers or fencing. Cellars measured at 4 feet deep. Refer to Photo Log attached.		

Corrective Action:	Install cellar cover to maximize safety and wildlife welfare. If holes remain that would allow wildlife ingress, install means of Wildlife egress, or fill in cellar if practical.	Date:	06/15/2020
--------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------	------------

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Location Construction**

Location ID: 314168 CDP: \_\_\_\_\_

Comment: \_\_\_\_\_

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>465889</u>	Type: <u>WELL</u>	API Number: <u>097-06016</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>465890</u>	Type: <u>WELL</u>	API Number: <u>097-06017</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>

--

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Comment: 2A states that size of Disturbed area during construction expansion will be .76 Acres and that size of Location after Interim Reclamation will be .76 acres. it appears from aerial measurements on Google Earth that disturbance size is closer to 1.5 Acres..

**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 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 \_\_\_\_\_

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
<p><b>Comment:</b> Most BMPs have failed and do not appear adequate for the project area or initially installed properly. There is sloughing and cracking where access road enters location and lack of BMPs installed along access road. Sediment migration is occurring, slopes do not appear stable. Generally, it appears site was not adequately stabilized or prepared for wintering in these extreme conditions, over 10,000 feet in elevation. Refer to Photo Log attached.</p> <p><b>Corrective Action:</b> Install or repair sufficient / effective BMPs in accordance with, and monitoring per Good Engineering Practices per Rule 1002.f.</p>						<p><b>Date:</b> 07/01/2020</p>
<p><b>Pits:</b> <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**Attached Documents**

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

Document Num	Description	URL
402410588	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5163994">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5163994</a>
692402226	Inspection Photos RI	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5163992">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5163992</a>