

**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:

07/08/2020

Submitted Date:

07/10/2020

Document Number:

696201480

**FIELD INSPECTION FORM**

Loc ID 312408 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

City: DENVER State: CO Zip: 80202

**Status Summary:**

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

**Findings:**

8 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
, "		COGCC.inspections@caerus oilandgas.com	All Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221515	WELL	PA	08/12/2008	OW	077-08116	ACCO-WOOD ET AL 1-32	RI
312408	LOCATION	CL			-	ACCO-WOOD ET AL- 610S96W 32SESE	RI

**General Comment:**

On 7/8/2020, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Caerus Piceance's ACCO-Wood Et Al 1-32 location in Mesa County, Colorado.

This inspection in response to a 1001.c, 502.b reclamation variance request:

Operator submitted doc. #402378934 on 4/30/2020 requesting that ~0.8 miles of access road be left un-reclaimed, and that partial contouring of the pad is conducted per the request of the surface owner. 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 "1001.c: Reclamation Variances and Waivers" operator guidance document. Please refer to the guidance document for additional details.

Please note:

The submission of a variance request does not guarantee approval. The COGCC will provide notice to Operator once an official decision has been made. All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation. Approval of a variance does not absolve the operator from possible enforcement due to past non-compliance with reclamation rules for the subject location.

It was observed in this inspection that final reclamation of the Location is not progressing towards 1004 standards. Signage remaining on the Location with incorrect Operator information; Signage should either be updated or removed from Location. Noxious weeds observed on Location.

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

Refer to the photo-documentation 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: ☐

Emergency Contact Number:

Comment: It was observed in this inspection that a sign remains at the Location entrance with incorrect Operator information. Signage will need to be removed for final reclamation to be passed and therefore is no longer needed on the Location. If Operator wishes to keep signage on the Location, it will need to be updated with the correct Operator information.

Corrective Action: Update sign information to comply with 210 Rules, or remove from Location pursuant to 1004 rules.

Date: 07/27/2020

**Good Housekeeping:**

Type WEEDS

Comment: 1004.e Noxious weed issues are being addressed in the "Good Housekeeping" section to allow Operator the opportunity to address CA within a resolution form.

Field Bindweed (Convolvulus arvensis) was observed established on both the Location and access road. This is a Colorado State listed noxious weed.

Corrective Action: Comply with Rule 1004.e and conduct noxious weed management. Ongoing weed management is required until Location receives a passing final reclamation inspection.

Date: 07/27/2020

Overall Good: ☐**Spills:**

Type Area Volume

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Fencing/:**

Type LOCATION

Comment: Perimeter fence appears to be in proper functioning condition. Once site has achieved reclamation standards and is ready for final passing, fence will need to be removed.

Corrective Action:

Date:

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

Inspected Facilities									
Facility ID:	221515	Type:	WELL	API Number:	077-08116	Status:	PA	Insp. Status:	RI
Facility ID:	312408	Type:	LOCATION	API Number:	-	Status:	CL	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? \_\_\_\_\_

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: \_\_\_\_\_

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% **Fail** Cropland: perennial forage \_\_\_\_\_

Weeds present **Fail** Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: [See "COGCC Comments" for comments regarding reclamation](#)

Corrective Action: \_\_\_\_\_ Date **11/15/2020**

Comply with 1004 rules; Remove equipment and conduct additional reclamation/revegetation activities; Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage the reclamation until Final Reclamation has passed.

The optimum seeding window for the 2020 spring growing season has passed, therefore, a corrective action date of 11/15/2020 is being provided to allow Operator the opportunity to utilize more favorable seeding windows/conditions prior to the onset of winter.

Overall Final Reclamation

Fail

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 PIT

**COGCC Comments**

Comment	User	Date
<p><b>RECLAMATION COMMENT</b></p> <p>Operator submitted a 502.b SOVR to waive reclamation requirements of the oil and gas access road and that partial contouring of the pad is conducted. Records show well was plugged 8/12/2008. Per 1004 rules, final reclamation activities were required to be completed by 8/12/2009; It is noted that the variance request is being submitted almost 11 years after reclamation was required per rules</p> <p>At least 11 growing seasons have passed. It was observed in this inspection that the reclamation of the Location is not progressing towards 1004 final reclamation standards; Large areas of the Location is predominantly vegetated by undesirable weedy plant species, weeds deemed to be noxious, or is bare soil and not reflective of the reference area. Cattle panels and a fire ring were observed on the Location; Area appears to be in use and the added disturbances may be hindering the reclamation/revegetation of the Location; the 502.b Surface Owner Variance Request submitted is only requesting a variance to waive reclamation requirements of the access road, and does not include the Pad/Location. Location remains subject to 1004 Rules and requirements including, but not limited to, removal of equipment and revegetating.</p>	trujilloam	07/10/2020

**Attached Documents**

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

Document Num	Description	URL
696201481	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194466">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194466</a>