

**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:

07/28/2020

Submitted Date:

08/03/2020

Document Number:

696201574**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Trujillo, Aaron 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10128Name of Operator: BARGATH LLCAddress: 2717 COUNTY ROAD 215 SUITE 200City: PARACHUTE State: CO Zip: 81635**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**6 Number of Comments2 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
		aaron.galer@williams.com	
Heil, John		john.heil@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
460855	SPILL OR RELEASE	CL	12/05/2019		-	16" Pipeline Release	RI

General Comment:

On 7/28/2020, Reclamation Specialist Trujillo conducted a joint inspection with West Environmental Protection Specialist J. Heil, on Bargath LLCs 16" Pipeline release in Garfield County, Colorado. Refer to Remediation Project #12445 for additional detail.

This inspection is to document the reclamation of the disturbance/remediation area.

It was observed that desirable vegetative germination is evident, however establishment does not appear uniform or sufficient. Surface Owner representative on site indicated additional seeding activities were recently conducted, but it is unclear what areas were reseeded. After additional review of the "Reclamation Plan" (#402301613) attached to Form 27 No. 402287730) discrepancies exist (See "COGCC Comments"). Stormwater BMPs at time of inspection appear to be in proper functioning condition, though degradation of the BMPs is evident. Noxious weeds, and undesirable weedy plant species prevalent throughout the disturbance area.

The following compliance issues were observed during this inspection:

1004.a: Reclamation

1004.f: Weed control

Refer to the "Location", "Reclamation" and "Stormwater" sections 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.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	A corrective action regarding 1004.f "Weed Management" is being provided within the "Good Housekeeping" section of this report, to allow Operator to respond to the corrective action via a Resolution Form, if desired. See "COGCC Comments" for comments regarding weed management.		
Corrective Action:	Comply with 1004.f and conduct weed management. A corrective action date of 7/30/2020 is being provided as this is the date Operator was notified of the compliance issue, and due to several noxious weeds having matured and in the process of seed dispersal.		Date: <u>07/30/2020</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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 _____

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 **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: [See "COGCC Comments" for reclamation corrective actions.](#) Date **08/10/2020**

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>Comment: At time of inspection, no stormwater issues were observed; BMPs in place appeared to be in proper functioning condition. It is noted however, that the wattle/hay bale/tackifier BMPs are showing signs of aging.</p> <p>Continue to perform stormwater monitoring and management; maintain and/or implement site specific controls as needed prior to BMP failure and stormwater degradation, in order to avoid future corrective actions.</p> <p>Corrective Action: </p> <p>Date: _____</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments

Comment	User	Date
<p>1004.f WEED MANAGEMENT</p> <p>It was observed in this inspection that weed management activities appear to have been conducted; Several weedy plants showing signs of senescence. However, weed management appears insufficient; Viable undesirable weedy plant species such as Kohica sp., Salsola sp., and Amaranth prevalent throughout the disturbed areas. Several noxious weed species also observed: Musk Thistle (Carduus nutans), Bull Thistle (Cirsium vulgare), Canada Thistle (Cirsium avense) observed within the riparian areas of the disturbance; Several plants observed to have reached maturity and in the process of seed dispersal. Field Bindweed (Convolvulus arvensis), Chicory (Chicorium intybus), Halogeton (Halogeton glomeratus) observed throughout the upland disturbances. Tamarisk (Tamarix ramosissima) observed establishing within the ditch.</p>	trujilloam	07/29/2020
<p>RECLAMATION</p> <p>Comments: Per the "Reclamation Plan" dated 1/31/2020 (#402301613), initial reclamation and revegetation efforts of the disturbed spill area were conducted in 2019, with seeding activities performed in April and November of 2019.</p> <p>Disturbance area is approaching the end of the 2nd growing season since initial reclamation efforts; Though desirable vegetative germination is evident, establishment does not appear to be uniform throughout the entire disturbance area. A representative of the Surface Owner (Chevron) indicated that additional seeding activities had been conducted in the last month, though it is unclear whether the entire disturbance was reseeded, or only select areas. COGCC will be requiring additional information regarding 2020 reclamation efforts.</p> <p>It has come to the attention of the COGCC that the topsoil source of the soils imported to the remediation area may be from a nearby landslide area. Additionally, there appears to be discrepancies between the amount of impacted material removed from the site (3,917 cubic yards, "CY"), and the amount of material imported to the site (1,000 CY topsoil in April 2019, 560 CY topsoil from same supplier November 2019, and 120 CY of "garden-quality topsoil"; 1,680 CY total).</p> <p>CORRECTIVE ACTIONS:</p> <p>Multiple Corrective actions are being provided</p> <p>1) Submit, attached to a Sundry Notice Form 4, details, documentation and map figures of work (including but not limited to, reclamation activities, stormwater and weed management) conducted in 2020. Submit Form 4 to Reclamation Specialist by 8/10/2020</p> <p>2) Submit, attached to a Sundry Notice Form 4 by 8/10/2020, information regarding source material for all imported soils brought onto the location during remediation and reclamation efforts. At a minimum, submit figures showing location(s) of imported soils and the quantity.</p>	trujilloam	07/29/2020

invoices, and a comparative soils analysis conducted on the imported soils and reference topsoil to determine equivalency.

If no comparative soils analysis of the imported and reference topsoils were conducted, then Operator will be required to collect and test a minimum of three (3) discrete samples (without compositing) from both an appropriate adjacent reference area, and from the replacement topsoil, for a comparison of quality, composition and agronomic properties. Soil samples will need to be submitted to a laboratory specializing in agronomic soil testing; the soil analysis shall include, at a minimum, the following: SAR- from saturated paste extract, pH- saturated paste, Electrical Conductivity (EC)- saturated paste, % Organic Matter- Walkely-Black method, Nitrate- nitrogen AB-DTPA, Ammonium- nitrogen AB-DTPA, Phosphorus AB-DTPA, Potassium AB-DTPA, Zinc AB-DTPA, Iron AB-DTPA, Manganese AB-DTPA, Copper AB-DTPA, Chloride AB-DTPA, % Calcium Carbonate equivalent-gravimetric, Texture- by hydrometer with textures reported as USDA. Operator will be required to submit map/figures of soil sample locations for the reference topsoil, and the replacement topsoil. Operator will be required to submit the comparative soils analysis by 9/3/2020

3) Additional seeding activities may have been recently conducted; in order for the COGCC to make a clear determination whether or not seeding was sufficient, and if reclamation of the remediation area is progressing towards 1004 standards, Operator will be required to perform seedling germination transects in the fall of 2020. Transects will need to be conducted by a qualified third party contractor specializing in land reclamation. Operator/Contractor will need to determine how many transects, the transect length and quadrat size that will be necessary to uniformly and accurately assess the desirable perennial vegetative establishment within all areas of the disturbance area. Weedy vegetation, annual plant species and noxious weeds shall not contribute to the germination count. Operator will submit, attached to a Sundry Notice Form 4, figures including transect locations, and transect data sheets showing desirable perennial plant seedlings per square foot. Submit Form 4 to Reclamation Specialist by 10/1/2020.

See the attached "Germination Data sheet" for example data sheet of a 100' transect with ½ meter square quadrats.

Attached Documents

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

Document Num	Description	URL
696201575	Germination Transect example	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5215654
696201609	Weed notice to Operator	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5215655
696201610	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5215656