

**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:

08/17/2020

Submitted Date:

08/18/2020

Document Number:

697501883**FIELD INSPECTION FORM**Loc ID 428627 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10459Name of Operator: EXTRACTION OIL & GAS INCAddress: 370 17TH STREET SUITE 5300City: DENVER State: CO Zip: 80202**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**9 Number of Comments5 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                         |
|-----------------|-------|---------------------------------------|---------------------------------|
| Adamczyk, Megan |       | megan.adamczyk@state.co.us            |                                 |
| ,               |       | COGCCInspections@extracti<br>onog.com | <a href="#">All inspections</a> |

**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|---------|---------------|-------------|
| 428627      | LOCATION | AC     |             |            | -       | BROMLEY 32-32 | RI          |

**General Comment:**

This inspection is in response to a reclamation complaint. Refer to the lease road, good housekeeping, complaint, reclamation and stormwater sections for more detail.

Due to the extent of the violations, this inspection is being entered for notification and documentation only and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c.

**Location**

|                    |   |       |            |
|--------------------|---|-------|------------|
| <b>Lease Road:</b> |   |       |            |
| Type               | Main  |       |            |
| comment:           | This location does not comply with Rule 603.f. Unmanaged weeds were observed on the access road. Refer to the attached inspection photos.   |       |            |
| Corrective Action  | <p>Comply with Rule 603.f.</p> <p>The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.</p> | Date: | 08/17/2020 |

Overall Good: ☐**Emergency Contact Number:**

|                    |  |  |             |
|--------------------|--|--|-------------|
| Comment:           |  |  |             |
| Corrective Action: |  |  | Date: _____ |

**Good Housekeeping:**

|                    |  |       |            |
|--------------------|--|-------|------------|
| Type               | WEEDS  |       |            |
| Comment:           | This location does not comply with Rule 1003.f. Unmanaged List B Colorado noxious weeds (Musk and Canada thistle) were observed at the location.   |       |            |
| Corrective Action: | <p>Comply with Rule 1003.f.</p> <p>The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.</p> | Date: | 08/17/2020 |

Overall Good: ☐**Spills:**

|      |      |        |  |  |
|------|------|--------|--|--|
| Type | Area | Volume |  |  |
|------|------|--------|--|--|

In Containment: No

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

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Flaring:**

|                    |  |       |
|--------------------|--|-------|
| Type               |  |       |
| Comment:           |  |       |
| Corrective Action: |  | Date: |

| Inspected Facilities |  |       |          |             |   |         |       |               |    |
|----------------------|--|-------|----------|-------------|---|---------|-------|---------------|----|
| Facility ID:         | 428627   | Type: | LOCATION | API Number: | - | Status: | AC    | Insp. Status: | RI |
| Complaint            |  |       |          |             |   |         |       |               |    |
| Comment:             | Complaint #: 200449142<br>Field Inspector Assigned: Chris Binschus<br>Location ID#: 428627<br>Inspection Document #: 697501883<br>Nature of complaint: Complainant had concerns about interim reclamation at the well location, weeds and stormwater management. |       |          |             |   |         |       |               |    |
| Corrective Action:   |  |       |          |             |   |         | Date: |               |    |

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

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

Land Use: IMPROVED PASTURE

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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

This location does not comply with Rule 1002.c. The rule states best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Topsoil stockpile has significant cheatgrass establishment, which appears to be spreading off location onto the adjacent land. Cheatgrass is generally considered a winter annual; therefore, the life cycle (germination, flowering and seed set) has already occurred.

Corrective Action \_\_\_\_\_

Operator shall use BMPs to control cheatgrass to comply with Rule 1002.c.

Date **08/17/2020**

The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.

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? 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? Fail

## RESTORATION AND REVEGETATION

Cropland

Top soil replaced Fail Recontoured Fail Perennial forage re-established Fail

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? F

## Comment

This location does not comply with Rule 1003.b. Operator has failed to perform interim reclamation to reduce disturbance areas only reasonably needed for production operations. First production date for both wells was on 6/27/2012; therefore, interim reclamation should have been completed by 9/27/2012. This location is nearly eight (8) years out of compliance.

Since interim reclamation was never performed, the landowner has not been able to successfully flood irrigate the northern property.

Note: only one well (123-35447) remains at the location.

## Corrective Action

**Comply with Rule 1003.b.**

Collaborate with the landowner to determine mitigating measures that will allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production, which will likely mean interim reclamation will need to be performed this fall 2020 season. Also, ensure consultation regarding the implementation of proper flood irrigation is completed.

Corrective action date is being backdated to when interim reclamation should have been completed.

Date 09/27/2012

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: IMPROVED PASTURE

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: This location does not comply with Rule 1002.f.(2). Operator has failed to control and manage stormwater, as gully erosion was observed along the western fill slope.

Corrective Action: Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices.

Date: 08/17/2020

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Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

| Comment  | User      | Date       |
|--|-----------|------------|
| The day of this inspection COGCC staff, Chris Binschus, communicated via a phone conversation to an Operator representative the complaint. | binschusc | 08/18/2020 |

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 697501884    | Inspection Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5226895">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5226895</a> |