

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10459
Name of Operator: EXTRACTION OIL & GAS INC
Address: 370 17TH STREET SUITE 5300
City: DENVER State: CO Zip: 80202

Findings:

- 9 Number of Comments
- 5 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
		COGCCInspections@extractionog.com	All inspections
Adamczyk, Megan		megan.adamczyk@state.co.us	

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

Lease Road:			
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:	Comply with Rule 603.f.	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.		

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:	Comply with Rule 1003.f.	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.		

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](#)
[Field Inspector Assigned: Chris Binschus](#)
[Location ID#: 428627](#)
[Inspection Document #: 697501883](#)
[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 _____

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
<p>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.</p> <p>Corrective Action: Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices.</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
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

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
402469977	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5226897
697501884	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5226895