

Response Table

12/26/2019 Freedom 33 (Loc ID 452048) COGCC Inspection

Inspection 697500961, Inspector Chris Binschus

Corrective Action #	Corrective Action Type	Corrective Action	Due Date	Confluence Response
1	1002.c. - Protection of Soils	<p>This location is not in compliance with Reclamation rules. Rule 1002.c. states all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling & production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.</p> <p>Topsoil stockpile has significant weed cover with no perennial vegetation that would compete with weedy vegetation and generally work to decrease weed growth. Refer to the attached inspection photos for more detail.</p> <p>Best management practices to prevent weed establishment shall be implemented. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted.</p> <p>The corrective date (12/26/2019) is not intended to be the date for which the Operator shall complete the corrective action, but rather the corrective date is the date the location was observed out of compliance.</p>	Flexible, depending on next favorable seeding opportunity	As of Sunday 11/1/2020 at the Freedom 33 location topsoil mound; weeds have been mowed, the soil re-tilled, and the entire topsoil mound has been reseeded.
2	1003.b. & f. - Interim Reclamation & Noxious Weeds	<p>This location is not in compliance with Rule 1003.b and Operator has filed to comply with the 2017 policy regarding Interim Reclamation Procedures for Delayed Operations. COGCC staff conducted a review of the well files and was unable to find evidence of continuous operations; therefore, Interim Reclamation should have been conducted three months after the last well went on production. Note: A valid Form 2 does not extend the time for commencing interim reclamation under Rule 1003.</p> <p>Also, Operator has failed to control & manage undesirable and noxious weeds along the northern location and southern fill slope of location.</p> <p>Corrective Action #1: Comply with Rule 1003 to perform Interim Reclamation. Corrective action date is being back-dated to when all Interim Reclamation should have been completed.</p> <p>Corrective Action #2: Comply with Rule 1003.e.(1), Operator shall perform best management practices to prevent weed establishment.</p>	2/28/2018	<p>Per CA #1, Confluence submitted a 502.b. variance request to delay interim reclamation for the Freedom 33 location on 5/11/2020. This variance was approved by the COGCC on 8/4/2020 with a requirement to interim reclaim the location by May 2025.</p> <p>Per CA #2, Confluence has removed noxious weeds from the topsoil pile and reseeded with native grass mix as of 11/1/2020, as mentioned above.</p>