

FORM  
INSPRev  
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## 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:

11/19/2020

Submitted Date:

11/23/2020

Document Number:

696202027

### FIELD INSPECTION FORM

Loc ID 414132 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 77330  
Name of Operator: SG INTERESTS I LTD  
Address: 100 WAUGH DR SUITE 400  
City: HOUSTON State: TX Zip: 77007

**Status Summary:**

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

**Findings:**

- 5 Number of Comments  
2 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
,		inspection@sginterests.com	All Inspections
De Paolo, Corey		corey.depaolo@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
414132	LOCATION	AC			-	Cow Skull 11-89-18 1	RI

**General Comment:**

On 11/19/2020, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at SG Interests' Cow Skull 11-89-18-1 location in Gunnison County, Colorado.

This inspection is a followup to inspection #696201334, and #696201673 to document compliance with the following corrective actions:  
1002.f.(2)C: Stormwater

This inspection is also in response for Resolution Form #402513704 stating corrective actions have been addressed

Refer to the "Reclamation" and "Stormwater" section 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.

**Inspected Facilities**

Facility ID: 414132 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

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

Land Use: IMPROVED PASTURE, IRRIGATED, OTHER

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? Fail Production areas stabilized? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? Fail  
 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? Fail

**RESTORATION AND REVEGETATION**

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 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 Operator previously received an approved 502.b delayed operations interim reclamation waiver (Doc. #401721595). Sundry expired 2/5/2020 and reclamation was required. FIR #696201334 observed that interim reclamation appeared to have been conducted; after additional review of aerial imagery and observations of the Location it has been determined that this was incorrect.  
  
Though work had been conducted on the western areas of the Location, reclamation of areas not needed for production on the Location has NOT been conducted pursuant to 1003 requirements, and per Form 4 #401721595 COAs.

Corrective Action Comply with COGCC 1003 rules and conduct interim reclamation. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. 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 this site until Final Reclamation has passed. A CA date of 2/5/2020 is being applied since this is the expiration of the interim reclamation delayed variance doc. #401721595.

Date 02/05/2020

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

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

Final Land Use: IMPROVED PASTURE, IRRIGATED

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: Inspection #696201334 and #696201673 observed insufficient or missing stormwater and erosion control BMPs on the Location in accordance with Rule 1002.f.</p> <p>It was observed in this inspection that a sediment trap and perimeter ditch has not been constructed in accordance with good engineering practices for the sites conditions; slopes on location exposed soils- erosion/stabilization BMPs not installed on slopes.</p> <p>Corrective Action: Install or repair required BMPs in accordance with Rule 1002.f and good engineering practices; Maintain BMPs in proper functioning condition; Continue stormwater management until Location receives a passing final reclamation inspection, pursuant to Rule 1002.f.</p> <p>Interim reclamation due on the Location. Temporary stabilization controls will be required on areas to be interim reclaimed; Long term stabilization BMPs will be required on all areas not interim reclaimed.</p>						Date: 06/13/2020
<p><b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**COGCC Comments**

Comment	User	Date
<p>Inspection #699801398 observed an unused pump jack on the Location and required Operator to comply with the following corrective action by 10/8/2020: "Production facilities, shall be kept free of equipment and supplies not necessary for use on that lease. Remove all unused equipment from location."</p> <p>Unused equipment appears to have been removed; Inspector requiring corrective action is being included within this report for notification.</p>	trujilloam	11/20/2020

**Attached Documents**

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

Document Num	Description	URL
696202045	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296734">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296734</a>