

DATE: MARCH 19, 2021

IN REFERENCE TO THE FOLLOWING INSPECTION REPORT

Inspection Date: 3/16/2021

Document Number: 696202458

Submitted Date: 03/17/2021

**Inspected Facilities: SKR MAN CAMP (CHEVRON SHALE W 11-34)**

**General Comment:**

On 3/16/2021, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Chevron USA's Chevron Shale

W11-34 location in Garfield County, Colorado.

This inspection is a follow-up to #696201596 and #696202317 to document compliance with the following corrective actions:

-Install or repair required BMPs per Rule 1002.f.(2)C

It was observed in this inspection that the Location remains out of compliance with Rule 1002.f and the corrective action. Refer to the "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 inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Comment:** Inspection #696201596 and #696202317 observed that stormwater and erosion control measures have not been installed in accordance with good engineering practices.

Operator was required to comply with Rule 1002.f.(2)C by 8/18/2020.

It was observed in this inspection that Operator has installed rock aggregate and rock socks within portions of the erosion channel to be used in conjunction with the wattle control measures, however, the wattle BMPs on the Location remain improperly installed /not installed in accordance with good engineering practices; wattles have not been trenched and backfilled per good engineering practices.

Original corrective action has not been addressed in its entirety; original CA and date remains applicable.

**Corrective Action:** Install or repair required BMPs per Rule 1002.f.(2)C

Below is the Rule 1002.f(2)ABC and Rule 1002(3)A for reference. These rules or parts thereof may be referenced later in this report.

**1002.f.**

**f. Stormwater management.**

(2) Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site-specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices, including measures such as:

**A. Covering materials and activities and stormwater diversion** to minimize contact of precipitation and stormwater runoff with materials, wastes, equipment, and activities with potential to result in discharges causing pollution of surface waters.

**B. Materials handling and spill prevention procedures and practices** implemented for material handling and spill prevention of materials used, stored, or disposed of that could result in discharges causing pollution of surface waters.

**C. Erosion controls** designed to minimize erosion from unpaved areas, including operational well pads, road surfaces and associated culverts, stream crossings, and cut/fill slopes.

**1002.f.**

(3) Operators of oil and gas facilities shall develop a Post-Construction Stormwater Program in compliance with this section no later than the time of termination of stormwater permits issued by the Colorado Department of Public Health and Environment for construction of oil and gas facilities.

A. The Post-Construction Stormwater Program shall reflect good faith efforts by operators to select and implement BMPs intended to serve the purposes of this rule. BMPs shall be selected to address potential sources of pollution which may reasonably be expected to affect the quality of discharges associated with the ongoing operation of production facilities during the post-construction and reclamation operation of the facilities.

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The Chevron SWMP for Skinner Ridge that was approved on September 24, 2020 gives the following guidance on the installation of Straw Wattles:

5. IT IS RECOMMENDED THAT SEDIMENT CONTROL LOGS BE TRENCHED INTO THE GROUND TO A DEPTH OF APPROXIMATELY  $\frac{1}{3}$  OF THE DIAMETER OF THE LOG. IF TRENCHING TO THIS DEPTH IS NOT FEASIBLE AND/OR DESIRABLE (SHORT TERM INSTALLATION WITH DESIRE NOT TO DAMAGE LANDSCAPE) A LESSER TRENCHING DEPTH MAY BE ACCEPTABLE WITH MORE ROBUST STAKING

6. THE UPHILL SIDE OF THE SEDIMENT CONTROL LOG SHALL BE BACKFILLED WITH SOIL THAT IS FREE OF ROCKS AND DEBRIS. THE SOIL SHALL BE TIGHTLY COMPACTED INTO THE SHAPE OF A RIGHT TRIANGLE USING A SHOVEL OR WEIGHTED LAWN ROLLER.

**Current Status as of 3/18/2021 of the Storm Water controls on the SKR MAN CAMP(CHEVRON SHALE 11-34):**

On March 18, 2021 the uphill portion of all straw wattles in place on the Man Camp reclaim were backfilled by raking at least two to three inches of soil on the uphill side of each straw wattle on the location. This soil was compacted by stepping/walking on the newly placed material. Most of the wattles in place on the location show little erosion above or below the wattle. The additional material raked into place will further reduce any erosion on the location. We are meeting the for wattle installation requirements set forth in the Chevron SWMP, referenced above. Please see pictures.

A further note: there is no guidance in the Rule 1002 as to the correct installation of straw wattle BMP's.

The area to South side of the location is an area that has several contours that drain into an old drainage that existed prior to the Man Camp location being built. During the reclaim of this location it was noted that this area would be an area that would require maintenance and upkeep during the reclamation process due to the drainage in the area. There has been considerable effort made previously and, on this date, to reinforce this area to reduce the amount of erosion in this area of the Man Camp.

As of March 18, 2021 the following has been done to reinforce/correct the BMP installation in this area of the Man Camp:

1. **Riling caused by erosion has been raked and filled. See pictures.**
2. **Straw wattles have been reinforced by raking and compacting material on the uphill side of the wattles. Pictures are attached.**
3. **Rock armor has been places above and below wattles that were impacted by run off water. This rock armor is in place to reduce the velocity of run off above and below the wattles, in order to reduce the impact of runoff water in the areas above and below the wattles. This should reduce wash outs above, below and under the wattles. Pictures attached.**
4. **Rock armor was added in areas to reduce the velocity run off water and therefore the amount of erosion on the South side of the Man Camp location. See pictures.**
5. **Rock Socks have been added as VCD's and will help in control erosion and water velocity. See Pictures.**

The straw wattle BMP's on the Man Camp have for the most part have been effective in reducing and controlling erosion on this location. The current efforts should help reduce any additional erosion and reduce the effect of any water run off. Wattles will not be removed and reinstalled as this will increase the chance of additional erosion due to the disturbance of the soil and vegetation where work would be completed. Storm water BMPs currently in place are embedded in the ground and have some plant growth around them. The additional BMP material on the South side of the Man Camp should help stabilize and reduce erosion in this area.

In accordance with Rule 1002(3) Chevron has developed a SWMP and has made a good faith effort to install Storm Water BMP's according to this plan. Additionally, Chevron has made a good faith effort to reduce and control erosion by installing and maintaining said BMP's. We continue to meet the intent of Rule 1002.f.(2) and (3).





MATERILA RAKED ABOVE WATTLE





2-3 INCH OF WATER RAKEED  
ABOVE WATTLE AND COMPACTED  
RILLING RAKED





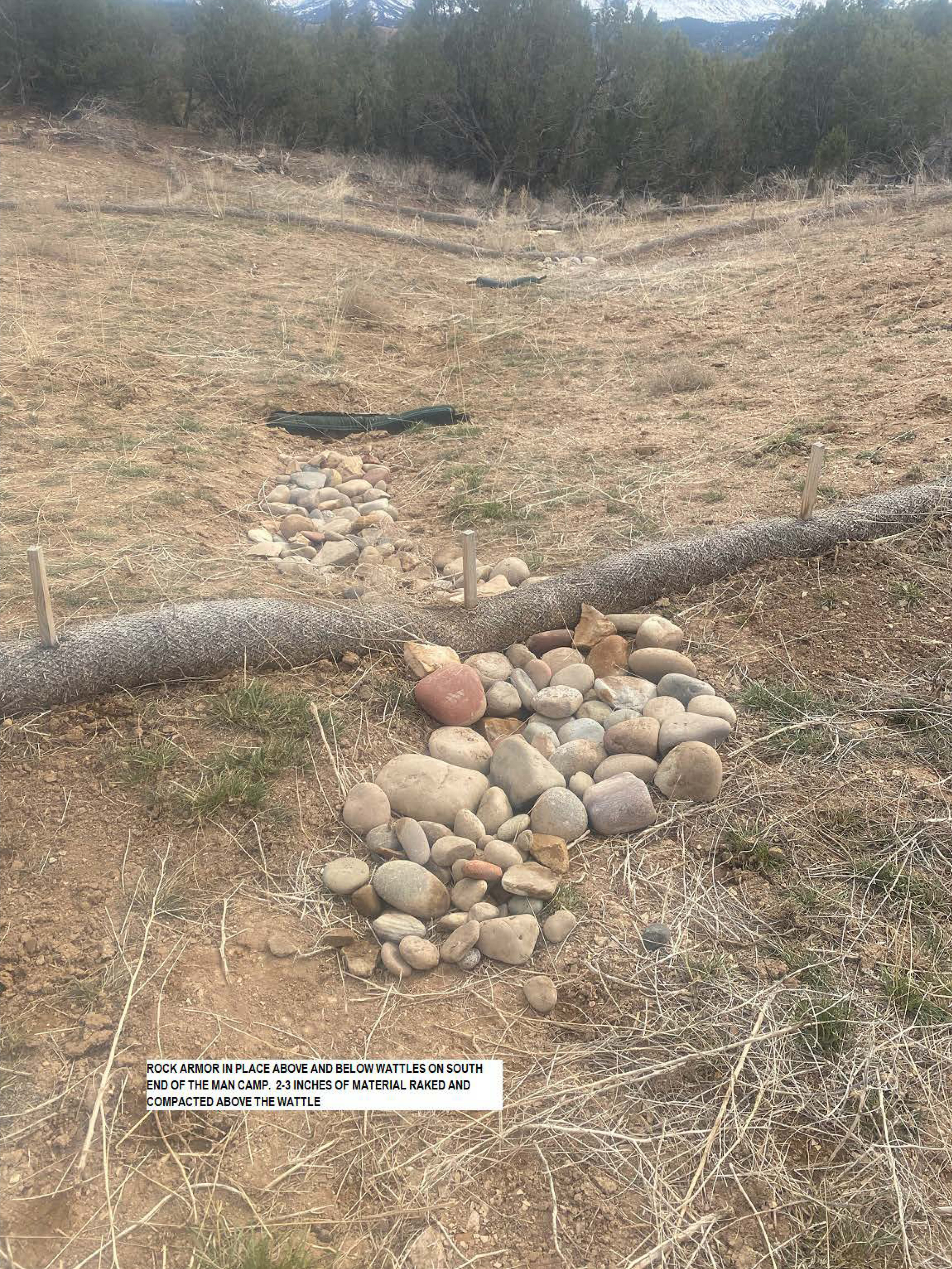
2-3 INCH OF MATERIAL RAKED AND  
COMPACTED ABOVE WATTLE.  
RILLING AND EROSION RAKED





ROCK ARMOR IMPLACE TO REDUCE WATER VELOCITY AND REDUCE EROSION.  
ROCK ABOVE AND BELOW WATTIE WITH ROCK IN EROSION TO GONTROL RUN OFF  
WATER,





ROCK ARMOR IN PLACE ABOVE AND BELOW WATTLES ON SOUTH  
END OF THE MAN CAMP. 2-3 INCHES OF MATERIAL RAKED AND  
COMPACTED ABOVE THE WATTLE



**FORM  
INSP**Rev  
X/20**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:

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696202458**FIELD INSPECTION FORM**Loc ID 382974 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 16700Name of Operator: CHEVRON USA INCAddress: 100 CHEVRON ROADCity: RANGELY State: CO Zip: 81648**Status Summary:**

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

**Findings:**4 Number of Comments1 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
Patterson, Chris		spwu@chevron.com	<a href="#">All Inspections per Olson</a>
Olson, Andrew		andrewolson@chevron.com	<a href="#">Principal Agent</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
210924	WELL	DA	10/01/1990	DA	045-06682	CHEVRON SHALE W11-34	RI
382974	LOCATION	CL			-	CHEVRON SHALE-66S98W 34SWNW	RI

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Inspected Facilities									
Facility ID:	210924	Type:	WELL	API Number:	045-06682	Status:	DA	Insp. Status:	RI
Facility ID:	382974	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI



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

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Waddles	Fail					

Comment: [Inspection #696201596 and #696202317](#) observed that stormwater and erosion control measures have not been installed in accordance with good engineering practices. Operator was required to comply with Rule 1002.f.(2)C by 8/18/2020.

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Corrective Action: [Install or repair required BMPs per Rule 1002.f.\(2\)C](#)

Date: 08/18/2020

Pits: ☐ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
696202459	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5378827">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5378827</a>