

**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:

03/31/2021

Submitted Date:

04/02/2021

Document Number:

696202531**FIELD INSPECTION FORM**Loc ID 414132 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 77330Name of Operator: SG INTERESTS I LTDAddress: 100 WAUGH DR SUITE 400City: 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 Comments2 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
,	970-385-0696	inspection@sginterests.com	All Inspections
Arthur, Denise		denise.arthur@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 3/31/2021, 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, #696201673 and 696202027 to document compliance with the following corrective actions:

1002.f.(2)C: Stormwater

1003: Interim Reclamation

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

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.

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? _____

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 REVEGETATIONCropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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. Previous inspection observed that reclamation of areas not needed for production on the Location has not been conducted in accordance with COGCC 1003 requirements. Inspection required Operator to comply with COGCC 1003 rules and conduct interim reclamation.

It was observed in this inspection that reclamation work of areas not needed for production has not been conducted in accordance with COGCC Rules and Corrective actions.

This corrective action has not been addressed and remains applicable.

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 predisturbance 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.

Date 02/05/2020Overall 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

Comment: [See "COGCC Comments" for comments regarding Stormwater.](#)

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.**

Date: 06/13/2020

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.

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

Comment	User	Date
STORMWATER COMMENT Previous inspection documented that control measures to manage runoff and stabilize/protect the Location were missing or insufficient. Inspections required Operator to comply with Rule 1002.f.(2)C. It was observed in this inspection that stormwater and erosion control measures remain missing or insufficient on the Location, in accordance with Rule 1002.f.(2)C and corrective actions; BMPs to stabilize and protect the slopes of the Location remain missing or insufficient; sediment trap not constructed in accordance with good engineering practices and does not appear to be sufficient in size; slope drains have not been constructed with an appropriate outlet in accordance with good engineering practices; inlet for slope drain on the southeastern end of the location not observed, inlet appears to have been covered with sediment; wattle BMPs within ditch not maintained in proper functioning condition. This corrective action has not been addressed and remains applicable.	trujilloam	04/01/2021

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

Document Num	Description	URL
402647054	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5393079
696202532	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5393075