

**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:

05/21/2021

Submitted Date:

05/25/2021

Document Number:

696202713**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:6 Number of Comments3 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
,		dnr_cogccenforcement@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 05/21/2021, 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 dated 5/26/2020,
#696201673 dated 8/31/2020,
#696202027 dated 11/19/2020,
#696202531 dated 3/31/2021,
and #696202648 dated 5/6/2021,

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", "Stormwater" and "Good Housekeeping" 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.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	Inspection #696202648 observed noxious weeds on th slopes of the west end of the Location, and on the berm on the northwest end of the Location. Inspection required weed management by 6/7/2021.		
	Noxious weed management has not yet occurred; weeds remain evident. CA from Inspection #696202648 remains applicable.		
Corrective Action:	Comply with Rule 1003.f. and Rule 606		Date: 06/07/2021

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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? F

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 inspections 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 on 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
<p>STORMWATER COMMENT</p> <p>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.</p> <p>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; scouring/degradation becoming evident around riprap at outlet; 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/filled with sediment.</p> <p>This corrective action has not been addressed and remains applicable.</p>	trujilloam	05/25/2021

Attached Documents

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

Document Num	Description	URL
696202715	Inspection Photos	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5440149