

**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:

09/21/2021

Submitted Date:

09/22/2021

Document Number:

697503263

**FIELD INSPECTION FORM**Loc ID 320748 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 19035

Name of Operator: OVERLAND RESOURCES LLC

Address: SUITE C18 PMB 440

City: GREENWOOD State: CO Zip: 80121

**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

8 Number of Comments

4 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
		cpandolfo@gmail.com	
		greg@overlandresourcesllc.com	
		behrens@netecin.net	
Whittington, Ellice		ellice.whittington@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
450838	TANK BATTERY	AC			-	State Craig 2&4-16 Battery	RI

**General Comment:**

This inspection is in response to a reclamation complaint. Refer to the Good Housekeeping, Complaint, Flowline and Interim Reclamation sections for more detail.

This inspection has been edited to include Behrens Resources (Op# 10695), as they are a responsible party for Overland's assets.

**Location**Overall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	Due to the extent of the List B Colorado noxious weed, Diffuse knapweed, which appears to be spreading off location, a certified professional weed contractor shall conduct all weed management.		
Corrective Action:	Operator shall present evidence in the form of a certificate of license issued by the Colorado Department of Agriculture within the required submission of the Field Inspection Report Resolution form.  There is no corrective action date because this might be referred to Enforcement.		Date:
Type	WEEDS		
Comment:	Unmanaged undesirable (Russian thistle and Kochia) and noxious (Diffuse knapweed) weeds were observed throughout the entire tank battery. Refer to the attached inspection photos.  Diffuse knapweed is a List B Colorado noxious weed that reproduces and spreads from seed, which can blow around in a tumbleweed fashion.		
Corrective Action:	Comply with Rule 606.c.  Diffuse knapweed- Operator shall cut, bag, remove, and properly dispose of all knapweed to prevent the further spread of seed, then follow up with a herbicide treatment.  There is no corrective action date because this might be referred to Enforcement.		Date:

Overall Good: ☐

<b>Spills:</b>			
Type	Area	Volume	

In Containment: No

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

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**Facility ID: 450838 Type: TANK API Number: - Status: AC Insp. Status: RI**Complaint**

Comment: [Complaint #: 402813726](#)  
[Field Inspector Assigned: Chris Binschus](#)  
[Location ID#: 320748](#)  
[Inspection Document #: 697503263](#)  
[Nature of complaint: Complainant has concerns that unmanaged weeds at the tank battery are a fire hazard.](#)

Corrective Action:

Date:

**Flowline**

#1 Type:

of Lines

Flowline Description

Flowline Type:

Size:

Material:

Variance:

Age:

Contents:

Integrity Summary

Failures:

Spills:

Repairs Made:

Coatings:

H2S:

Cathodic Protection:

Pressure Testing

Witnessed:

Test Result:

Charted:

COGCC Rules(check all that apply)☐ 1101. Installation and Reclamation☐ 1102. Operations, Maintenance, and Repair☐ 1103. Abandonment

Comment: [Based on the review of the well file, Operator has failed to comply with Rule 1101.b: Off-Location Flowline Registration.](#)

Corrective Action: [Contact COGCC Staff, Ellice Whittington, within seven \(7\) days.](#)Date: 09/29/2021

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

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

Land Use: \_\_\_\_\_

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? \_\_\_\_\_ 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? \_\_\_\_\_
- Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

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

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 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? \_\_\_\_\_ F \_\_\_\_\_

Comment

Due to another nearby tank battery with similar weed compliance issues, COGCC Staff has concerns that other locations also have weed compliance issues. Operator shall conduct the following corrective actions.

Corrective Action

1) Conduct an audit of all locations for weed compliance by no later than October 6, 2021. Submit a summary report to COGCC Staff, Chris Binschus, via a Form 4 Sundry by October 20, 2021.

2) After the Operator conducts the audit, Operator shall develop a plan and schedule to perform weed management. Operator shall include the plan and schedule within the Form 4 Sundry.

Note- COGCC Staff may request at any time, documentation of compliance for any of the locations. Operator will be required to provide documentation of compliance within 48 hours of the request.

Date **10/20/2021**Overall Interim Reclamation **Fail****Final Reclamation/ Abandoned Location:**

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

Final Land Use: \_\_\_\_\_

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 ☐**COGCC Comments**

Comment	User	Date
Behrens Resources has failed to properly bond up; therefore, the transfer from Overland to Behrens has not yet been completed.	binschusc	09/27/2021
COGCC Staff, Chris Binschus, left a voice message on 9/22/2021 at approximately 0840 with the Principal Agent, Gregory Pandolfo. Staff informed the Operator to return the phone call but has not received a phone call back at the time of this report submission (approximately 1545 on 9/22/2021).	binschusc	09/22/2021

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

Document Num	Description	URL
402819974	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537908">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537908</a>
697503264	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537895">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537895</a>