

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 19035
Name of Operator: OVERLAND RESOURCES LLC
Address: SUITE C18 PMB 440
City: GREENWOOD State: CO Zip: 80121

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.		Date:
	There is no corrective action date because this might be referred to Enforcement.		
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.		Date:
	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.		

Overall Good:

Spills:

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
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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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537908
697503264	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5537895