

**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:

11/08/2021

Submitted Date:

11/16/2021

Document Number:

693903865**FIELD INSPECTION FORM**Loc ID 312051 Inspector Name: ROY, CATHERINE On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10749Name of Operator: SIMCOE LLCAddress: 1199 MAIN AVE SUITE 101City: DURANGO State: CO Zip: 81301**Status Summary:**

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

Findings:4 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
Trujillo, Aaron		aaron.trujillo@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
, General		sjninspections@ikavenergy.co m	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
263927	WELL	PR	02/15/2021	GW	067-08731	BARNES A 2	RI

General Comment:

On 11/8/2021 Catherine Roy conducted a followup reclamation and stormwater inspection in response to stormwater erosion and discharges into waters of the state observed in July 2021 on locations mapped within the FEMA floodplain and Aquatic Native Species Conservation Waters.

During this inspection the following compliance issues were observed:

-Operator submittal of a single map illustrating straw wattle and berm placement is considered non-responsive to corrective action to submit a stormwater plan detailed in the 7/29/2021 reclamation inspection. As described in the corrective action, the plan needs to demonstrate that stormwater flows will be properly diverted and that the location will be protected from degradation. The plan needs to describe how all inlets and outlets will be properly designed and constructed to ensure stabilization using good engineering practices. The submitted map does not meet these requirements. To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing.

As observed on 11/8/2021, some of the eroded debris is removed and cobble (~3-6inch) is placed at down-stream side of facilities. The length of the cobble placement is significantly shorter than what was shown on the operator submitted SWMP map. Bare, unstabilized, and scoured soils remain where eroded debris was deposited and has since been removed. Well pad gravel that flowed off of the southern portion of the project area is not cleaned out. The straw wattles (6inch) placed within the northern swale (not properly installed) and an approximately 10inch berm placed at well pad entrance, are not adequate BMPs and do not demonstrate good engineering practices. Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

-Corrective action from 7/29/2021 to submit a shut-in plan per rule 421.b. is not addressed. Per the rule, the operator needs to submit their shut-in plan when requested. Operator statement on inspection response document indicates that operator engaged in correspondence with COGCC permitting staff regarding the shut in plan weeks after the corrective action date expired, and did not communicate with that staff member that the information was requested by a COGCC reclamation specialist in response to a corrective action inspection. Corrective action is back-dated to original corrective action date (8/2/2021) to document duration of non-compliance for enforcement purposes.

This is a shared location between Simcoe and Logos. It is the responsibility of both operator's who will receive this inspection, to ensure compliance with COGCC rules.

-It is apparent that eroded well pad material from July 2021 inspection was washed downstream into the Florida River (Waters of the State) as eroded material was observed downstream and in the river.

See below, and attached photos for additional detail.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

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

Type:	#		corrective date
Comment:	-Shut in plan was not provided per 7/29/2021 inspection. Additionally, Operator needs to ensure that all equipment is anchored per the 421.b. floodplain rules.		
Corrective Action:	-Corrective action to submit a shut-in plan per rule 421.b. is not addressed. Per the rule, the operator needs to submit their shut-in plan when requested. The corrective action is back-dated to original corrective action date (8/2/2021) to document duration of non-compliance for enforcement purposes.		Date: <u>08/02/2021</u>

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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

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

Comment: Operator submittal of a single map illustrating straw wattle and berm placement is considered non-responsive to corrective action to submit a stormwater plan detailed in the 7/29/2021 reclamation inspection.

Some eroded debris is removed and cobble (~3-6inch) is placed at down-stream side of facilities. While not an appropriate BMP in this area, cobble placement is not as long as mapped on SWMP map. Bare, unstabilized, and scoured soils remain where debris was deposited and since removed. Well pad gravel that flowed off of the southern portion of the project area remains. The straw wattles (6inch) are placed within swale (not properly installed) and an approximately 10inch berm placed at well pad entrance, are not adequate BMPs.

Corrective Action: Submit and implement a stormwater control plan. As described in the 7/29/2021 corrective action, the plan needs to demonstrate that stormwater flows will be properly diverted and that the location will be protected from degradation. The plan needs to describe how all inlets and outlets will be properly designed and constructed to ensure stabilization using good engineering practices. To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing.

Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

Date: 07/29/2021

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
402872525	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582546
402874353	Inspection Photos 11-8-2021 Updated	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5584107
693903881	Inspection Photos 7-29-2021	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582541
693903885	Inspection Photos 11-8-2021	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582542