

**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:

04/21/2022

Submitted Date:

04/26/2022

Document Number:

702800153

**FIELD INSPECTION FORM**

Loc ID 335228 Inspector Name: O'Malley, Anna On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

THIS IS A FOLLOW UP INSPECTION

FOLLOW UP INSPECTION REQUIRED

NO FOLLOW UP INSPECTION REQUIRED

**Findings:**

5 Number of Comments

1 Number of Corrective Actions

Corrective Action Response Requested

**Operator Information:**

OGCC Operator Number: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

City: DENVER State: CO Zip: 80202

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
,		COGCC.inspections@caerus oilandgas.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335228	LOCATION	AC			-	BENZEL DISPOSAL-66S93W 36NWNE	RI

**General Comment:**

On 04/21/2022, Reclamation Specialist O'Malley conducted an interim reclamation and stormwater inspection at Caerus Piceance LLC's Benzel Disposal-66S93W /36NWNE Location #335228 in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

- Unused concrete forms present
- Pad not adequately reduced
- Subsidence in eastern interim area
- Noxious weeds (knapweed)

Refer to the "Reclamation," "Stormwater" and "COGCC Comments" sections 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 inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Inspected Facilities**

Facility ID: 335228 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**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? Pass

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? \_\_\_\_\_  
 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 See "COGCC Comments" for "INTERIM RECLAMATION COMMENTS"

Corrective Action **Corrective Action #1: Conduct weed management to prevent further establishment and spread of noxious weeds in accordance with Rule 1003.f by 5/26/2022. Ongoing weed management is required until location passes final reclamation.**  
  
**Corrective Action #2: In accordance with Rule 1003; Remove unused concrete forms and reduce and reclaim areas no longer needed for production, including, but not limited to areas at the southeast of the pad, surrounding the concrete forms. Reclamation activities shall be completed no later than 5/26/2022.**  
  
**Corrective Action #3: Address subsidence occurring in the eastern interim areas of the Location in accordance with Rules 1003 and 602.c. by 5/26/2022.**

Date 05/26/2022

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

**Storm Water:**

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

Comment: [At the time of this inspection, it is unclear if the subsidence issues in the northeastern interim areas are a result of erosion.](#)

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

**Pits:**  NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
<p><b>INTERIM RECLAMATION COMMENTS</b></p> <p>#1. A patch of knapweed (CO List B Noxious Weed) is established in the interim area at the southwest of the Location, adjacent to the tank battery. Plants were observed to be sprouting new growth at the time of this inspection.</p> <p>#2. A row of concrete forms is present at the southeast of the pad area. This equipment does not appear to be necessary for production activities. The southeastern portion of the pad area, surrounding the unused concrete forms does not appear to be necessary for production activities. This area needs to be reclaimed per 1003 Rules. Interim reclamation includes but is not limited to, removal of unused equipment, compaction alleviation, gravel removal, recontouring/regrading and revegetation of areas not needed for production operations.</p> <p>#3. Subsidence is occurring throughout the northeastern interim area of the Location resulting in holes as large as approximately 3 feet wide, 4 feet long and 4 feet deep. COGCC has concerns, given that dozens of holes were observed across this area. The subsidence and resulting holes are interfering with achievement of 1003 Interim Reclamation standards. Additionally, the holes pose a danger to safety of employees, the public, and wildlife.</p> <p>#4. Interim reclamation areas throughout the Location (excluding those at the southeast of the pad mentioned in comment #2 and those to the northeast, mentioned in comment #3, where subsidence is occurring) are colonized by perennial grasses (crested wheatgrass, smooth brome, intermediate wheatgrass), shrubs (rabbitbrush, sagebrush) and undesirable plant species/weeds (pale madwort, bur buttercup). While the perennial grass species are not native, the adjacent reference areas also contain these same introduced perennial grass species.</p>	omalleya	04/25/2022

**Attached Documents**

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

Document Num	Description	URL
403027996	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5735489">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5735489</a>
702800154	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5735488">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5735488</a>