

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

06/22/2022

Submitted Date:

06/24/2022

Document Number:

696203781

## FIELD INSPECTION FORM

 Loc ID: 467272  
 Inspector Name: Trujillo, Aaron  
 On-Site Inspection:   
 2A Doc Num:
**Status Summary:**

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

**Findings:**

- 15 Number of Comments
- 8 Number of Corrective Actions
- Corrective Action Response Requested

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

**Operator Information:**
 OGCC Operator Number: 10456  
 Name of Operator: CAERUS PICEANCE LLC  
 Address: 1001 17TH STREET #1600  
 City: DENVER State: CO Zip: 80202
**Contact Information:**

Contact Name	Phone	Email	Comment
Arthur, Denise		denise.arthur@state.co.us	
,		COGCC.inspections@caerusoilandgas.com	All Inspections
Arauza, Steven		steven.arauza@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467272	LOCATION	AC			-	ELU J14 FED-496 PAD	RI

**General Comment:**

On 6/22//2022, Reclamation Specialist Trujillo inspected Caerus Piceance LLC's ELU J14 FED-496 Pad Location in Rio Blanco County, Colorado.

This inspection is a follow-up to #696203714 to document compliance with the following corrective actions:

- Protection of soils
- Spills / Impacted materials
- Good Housekeeping
- Stormwater

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

The following, additional compliance issues were observed during this inspection

- Signage
- Spills / Impacted materials
- Good Housekeeping

Refer to the "Location", "Reclamation" and "Stormwater" 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

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	BATTERY		
Comment:	<p>Battery with 3 tanks has been installed on the southwest end of the Location; facility and tanks missing signage and labeling.</p> <p>Unknown when tank battery was installed; ensure signage and labeling is installed at facility and tanks, within 60 days after the installation of battery.</p>		
Corrective Action:			Date:
Type	WELLHEAD		
Comment:	<p>Records show that as of 3/24/2022, all permitted wells on the Location have been drilled, or plugged. Signs at wells are required within 60 days after the well is completed.</p> <p>Signage missing from wells on the Location.</p>		
Corrective Action:	Install sign to comply with Rule 605.d.		Date: <u>07/24/2022</u>
<b>Emergency Contact Number:</b>			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
<b>Good Housekeeping:</b>			
Type	WEEDS		
Comment:	<p>Inspection #696203714 notified Operator of Undesirable Plant Species germinating on the Location, and advised maintenance to ensure Location remains free of Undesirable Plant Species pursuant to Rule 606.c.</p> <p>It was observed in this inspection that proactive measure to prevent weed establishment have not been taken by Operator- Undesirable Plant Species have continued to establish on the Location, as well as on the topsoil stockpiles along the Location's perimeter.</p>		
Corrective Action:	Comply with Rule 606.c and Rule 1002.c; ensure BMPs Best to prevent weed establishment and protect stockpiled soils are maintained per good engineering practices.		Date: <u>07/01/2022</u>
Type	DEBRIS		
Comment:	<p>Inspection #696203714 observed various trash and debris (e.g. dried weed debris, tube, plastics) were observed along the perimeter of the Location, and blown off-site north of the Location.</p> <p>It was observed in this inspection that trash/debris blown off from north of the Location appears to have been removed; however, weed debris and trash along the perimeter of the Location have not been removed.</p> <p>This CA has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 606; remove and properly dispose of trash and debris both on the Location, and blown off site from the Location.		Date: <u>05/25/2022</u>
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
Other			
Comment:	Stained soils observed on the east end of the Location. See photo 8.		
Corrective Action:	Investigate, clean up, and document impacts resulting from Spill/Release.		Date: <u>07/01/2022</u>
Other			

Comment:	Inspection #696203714 observed impacted materials due to drill cuttings spilled outside of containment, and that Operator failed to properly clean the spill.  Inspection required Operator to Provide analytical summary table comparing sample results for cuttings samples to Table 915-1 along with laboratory reports via a Form 4 Sundry to EPS Arauza.  No Form 4 Sundry with the required analytical summary has been submitted per the corrective action; corrective action remains applicable.		
Corrective Action:	Provide analytical summary table comparing sample results for cuttings samples to Table 915-1 along with laboratory reports via a Form 4 Sundry to EPS Arauza	Date:	05/25/2022
Other			
Comment:	Inspection #696203714 observed impacted materials due to drill cuttings spilled outside of containment, Operators is being directed to document cleanup efforts and provide documentation of the cleanup.		
Corrective Action:	Provide documentation, attached to a Form 4, of cleanup per Rule 912.a(5). Specificially, provide demonstration of compliance within the impacted area(s) with Table 915-1, including complete documentation of soil sampling (soil location diagram, analytical summary table, complete lab reports).	Date:	07/24/2022

In Containment: No

Comment: Inspection #696203714 observed impacted materials due to drill cuttings spilled outside of containment, and that Operator failed to properly clean the spill. Inspection required Operator to properly dispose oily waste and impacted materials per Rule 905.e.  
  
It was observed in this inspection that the impacted material appears to have been removed from surface per the CA; however, extent of the impact is unclear. See corrective action above regarding documentation of cleanup and compliance within the impacted area(s).

Multiple Spills and Releases?

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 467272 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: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment [See "COGCC Comments"](#).

Corrective Action [Comply with Rule 1002.b and 1002.c](#)

Date **06/18/2022**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment [See "Soil removal and Segregation", and "Stormwater"](#).

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? \_\_\_\_\_

Comment Records show that as of 3/24/2022, all permitted wells on the Location have been drilled, or plugged. Pursuant to Rule 1003.b, interim reclamation of the Location is required within 6 months, no later than 9/24/2022. A follow up inspection will be conducted to determine compliance with 1003 Rules.

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

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

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

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

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 <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>
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<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: <a href="#">See "COGCC Comments"</a>						Date: <u>05/25/2022</u>
Corrective Action: <span style="color:red;">Install or repair required BMPs per Rule 1002.f. Ensure control measures are adequate for the site's conditions, implemented in accordance with good engineering practices, and maintained in proper functioning condition.</span>						
<b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

**COGCC Comments**

Comment	User	Date
<p><b>PROTECTION OF SOILS COMMENT</b></p> <p>Inspection #696203714 observed that Operator has salvaged and placed topsoil along the perimeter of the Location; topsoil has been utilized at the base of the fill slopes/subsoils of the Location as a berm and sediment trap/pond to manage stormwater (See "Stormwater"). Topsoil has not been properly separated and protected, is being mixed with subsoil, and is at risk for loss due to stormwater discharge displacing the topsoil; Utilization of topsoil as stormwater control measures does not comport with Rule 1002.b and 1002.c. Inspection required Operator to comply with Rule 1002.b and 1002.c.</p> <p>It was observed in this inspection that topsoil remains in use at the base of the fill slopes/subsoils of the Location as a berm and sediment trap/pond to manage stormwater. Corrective action has not been addressed.</p>	trujilloam	06/24/2022
<p><b>STORMWATER COMMENT</b></p> <p>Inspection #696203714 observed that control measures to minimize erosion and degradation on the Location were missing or insufficient; control measures to minimize erosion/degradation at the slopes of the Location are missing or insufficient; Operator has utilized topsoil at the base of the fill slopes/subsoils of the Location as a berm and sediment trap/pond to manage stormwater. Topsoil is not an appropriate material to construct stormwater control measures, and is at risk of degradation, loss and displacement due to stormwater discharge; use of topsoil as stormwater control measures does not comport with Rule 1002.b and 1002.c.; topsoil stockpiles along perimeter predominantly bare, and unvegetated, and at risk to erosion; inlet at the sediment trap/pond on the north end of the Location does not appear to be properly engineered; gully erosion/degradation at the inlet/control.</p> <p>It was observed in this inspection that control measures to minimize erosion and degradation at the slopes of the Location, including the topsoil stockpiles along the perimeter of the Location, remain missing or insufficient. It was also observed in this inspection that additional work has been conducted to maintain inlet at the sediment trap on the north end of the Location, however inlet does not appear to have been constructed with geotextile lining per good engineering practices, and degradation beneath the armoring of the control is recurring.</p>	trujilloam	06/24/2022

**Attached Documents**

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

Document Num	Description	URL
403089585	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5789210">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5789210</a>
696203782	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5789205">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5789205</a>

