

**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:

07/27/2022

Submitted Date:

07/29/2022

Document Number:

696203898**FIELD INSPECTION FORM**Loc ID 479149 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10456Name of Operator: CAERUS PICEANCE LLCAddress: 1001 17TH STREET #1600City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:16 Number of Comments3 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
Arthur, Denise		denise.arthur@state.co.us	
, "		COGCC.inspections@caerus oilandgas.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479149	LOCATION	AC			-	BJU B26-496 Pad	RI

General Comment:

On 7/28/2022, Reclamation Specialist Trujillo inspected Caerus Piceance LLC's BJU B26-496 Pad location in Garfield County, Colorado.

This inspection is a followup to #696203134, #696203716 and #696203783 to document compliance with the following corrective actions:

- Stormwater
- Soil removal, segregation and protection of topsoil
- Material spills / spill prevention.

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

Refer to the "Location Construction", "Location" and "Reclamation" 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.

LocationOverall Good: ☐**Signs/Marker:**

Type OTHER

Comment: All materials/containers/etc... on site for use in drilling operations have been appropriately labeled to allow for identification.

Corrective Action:

Date:

Type OTHER

Comment: Signage at Location entrance

Corrective Action:

Date:

Emergency Contact Number:

Comment: 970-285-2615 (Location Entrance)

Corrective Action:

Date: _____

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:

Location Construction

Location ID: 479149

CDP: _____

Comment: Copy of the approved Form 2A posted within company trailer per 406.c

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action:

Date: _____

Wildlife BMPs:

Comment:

Corrective Action:

Date: _____

Stormwater:

Erosion BMPs

Present

Other BMPs

Present

	Covering Materials	Yes
Comments: Erosion BMPs: Materials on site observed with appropriate covering BMPs.		
Other BMPs: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
Corrective Action: _____		Date: _____
	Material Handling And Spill Prevention	
Comments: Erosion BMPs: Previous inspection observed various material spills observed on the south end of the Location. Inspection required Operator to Clean spills and and implement/maintain BMPs per good engineering and spill prevention practices.		
It was observed in this inspection that the previously observed spills appear to have been cleaned, however new spills are evident. Additionally, spill/impacted soils evident at equipment on the north end of the Location.		
Other BMPs: Cement material observed spilling onto pad surface from the storage container on south end of the Location.		
Corrective Action: Clean spills and and implement/maintain BMPs per good engineering and spill prevention practices.		Date: 08/03/2022
		2
Comments: Erosion BMPs: See "Comment #1" under "COGCC Comments" at end of this report.		
Other BMPs: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
Corrective Action: Comply with Rule 1002.f and implement perimeter stormwater and erosion control BMPs to manage runoff, and to allow for sediment laden-free discharge from the Location; ensure BMPs are installed accordance with good engineering practices, are adequate for the sites conditions, and are maintained in a proper functioning conditions. Ensure stockpiled topsoil is not incorporated with the BMPs, and remain protected.		Date: 09/10/2022
		1
	Material Handling And Spill Prevention	
Comments: Erosion BMPs: Previous inspection observed port-johns on Location missing BMPs to prevent or contain a spill.		
It was observed that porta-johns on Location have been secured/staked down to prevent spill. CA has been addressed.		
Other BMPs: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		
Corrective Action: _____		Date: _____
<u>Comment:</u> Note to Operator: Though minor spills and drips are apparent, Reclamation Specialist would like to commend Operator on the overall management of materials and spill prevention procedures in place on the Location.		
<u>Corrective Action:</u> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		<u>Date:</u> _____
On Site Inspection (305):		
<u>Surface Owner Contact Information:</u>		
Name: _____	Address: _____	
Phone Number: _____	Cell Phone: _____	
<u>Operator Rep. Contact Information:</u>		
Landman Name: _____	Phone Number: _____	
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____	
Request LGD Attendance: _____		
<u>LGD Contact Information:</u>		

Name: _____	Phone Number: _____	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>		
<div></div>		
<u>Summary of Operator Response to Landowner Issues:</u>		
<div></div>		
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>		
<div></div>		

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 SEGREGATION FailComment [See "Comment #2" under "COGCC Comments".](#)Corrective Action [Comply with Rules 1002.b.\(2\), 1002.c, and implement BMPs to stabilize/protect salvaged soils, and to ensure soil horizons remain properly segregated from separate soil horizons.](#)Date **09/10/2021**1002c. PROTECTION OF SOILS FailComment [Topsoil stockpiles/berms remain largely in use as part of the Location's perimeter stormwater BMPs, and at risk of degradation and contamination due to runoff \(see comment #1 and #2\).](#)

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 REVEGETATIONCropland

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 Continuous drilling operations observed.

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 ☐

Multi-Well Location ☐

COGCC Comments

Comment	User	Date
<p>COMMENT #2</p> <p>Previous inspections observed that soil salvage of all the topsoil on the Location does not appear to have been conducted, and that topsoil stockpiles have been implemented as part of the Location's perimeter stormwater BMPs; BMPs to ensure soils remain segregated, and protected from mixing/contamination with subsoils, as well as stormwater runoff, are inadequate.</p> <p>Inspections required Operator to implement BMPs to stabilize/protect salvaged soils, and to ensure topsoil is not utilized as part of the Location's stormwater controls, and that soil horizons remain properly segregated.</p> <p>Inspection also required Operator to submit documentation, attached to a Form 4, showing topsoil depths over the entire disturbance area, and actual amount salvaged. Operator submitted F4 #403094664, though technical issues resulted in Operator submitting the attachments via email (see attached). Operator reports 8,070 cubic yards of topsoil salvaged and stored; see sundry for additional details. This portion of the CA has been addressed.</p> <p>It was observed in this inspection that the topsoil stockpiles/berms remain largely in use as part of the Location's perimeter stormwater BMPs (ditch/berm and sediment traps/ponds), and remain at risk of degradation due to stormwater runoff (see comment #1).</p> <p>Location remains out of compliance with Rules 1002.b.(2) and 1002.c.</p>	trujilloam	07/29/2022

COMMENT #1

trujilloam

07/29/2022

Inspections #696203134, #696203716 and #696203783 observed that stormwater and erosion control BMPs to properly manage stormwater runoff, and to allow for sediment laden-free discharge were missing or insufficient at the Location. It was also observed that Operator incorporated topsoil stockpiles as part of the three (3) sediment traps/ponds, as well as the perimeter stormwater ditch/berm. Operator was notified that use of topsoil as a stormwater BMP puts the resource at risk of compaction, contamination due to mixing with sediment/subsoil, and at risk for loss due to stormwater discharge displacing the topsoil. Inspections also observed that the perimeter stormwater ditch at the base of the berms leading to the traps/ponds have not been properly consolidated, and the traps/ponds have not been constructed with an engineered outlet; this is not per good engineering practices. Inspection required Operator to comply with Rule 1002.f by 9/10/2021.

It was observed in this inspection that the topsoil stockpiles along the perimeter of the Location remain improperly incorporated as part of the sediment traps/ponds, as well as part of the stormwater diversion ditch/berm along the perimeter (see "Comment #2" and 1002.c for comments regarding topsoil salvage and protections). Though Operator's attempts to address the compliance issues were observed, BMPs remain inadequate:

-Operator previously applied Hydromulch to the perimeter stormwater diversion ditch; per good engineering, this is not an appropriate control for use in areas for channelized or concentrated flows, such as stormwater ditches. Unable to find evidence of other work to address the vertical slopes and/or the unconsolidated soils within the ditch. Additionally, hydromulch is degrading along areas of the topsoil, resulting in sediment loss/mixing/degradation.

-Previous inspection observed that, In order to minimize sediment transport and contact with stormwater runoff to, Operator placed straw wattles at the base of the stockpiles on the west end of the Location; BMP in conjunction with hydromulch appeared adequate to minimize degradation and contact with runoff; however Operator only implemented control at the berms on the west end of the Location; remaining topsoil stockpiles in use as part of the Locations perimeter stormwater diversion ditch/berm remain at risk.

-The three (3) sediment traps/pond have not been constructed per good engineering practices; traps/ponds remain improperly constructed with topsoil and are missing an engineered outlet to allow for proper stormwater discharge. Stormwater and erosion control BMPs to manage runoff in such a manner that is both protective of topsoil, and allows for sediment laden-free discharge from the Location remain missing or insufficient.

Corrective action has not been addressed and remains applicable.

Attached Documents

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

Document Num	Description	URL
403121995	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5816806
696203899	Operator attachment regarding topsoil salvage	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5816800
696203900	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5816801