

**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:

09/16/2022

Submitted Date:

09/23/2022

Document Number:

702800728

FIELD INSPECTION FORM

Loc ID: 466705
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

Operator Information:

OGCC Operator Number: 10728
Name of Operator: GULF EXPLORATION LLC
Address: 9701 N BROADWAY EXTENSION
City: OKLAHOMA CITY State: OK Zip: 73114

Findings:

- 7 Number of Comments
- 3 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 |
|------------------|--------------|---------------------------------|-----------------|
| AL SALOMONE | | asalomone@gulfexploration.com | All Inspections |
| Strickland, Sean | 405-840-3371 | sstrickland@gulfexploration.com | |
| JJ SIMONSEN | | jsimonsen@gulfexploration.com | All Inspections |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|---------------------|-------------|
| 466705 | LOCATION | AC | | | - | Eagle Hill 1-32 Pad | RI |
| 466706 | WELL | DG | 09/07/2019 | | 057-06625 | Eagle Hill 1-32 | RI |

General Comment:

On 09/16/2022, Reclamation Specialist O'Malley conducted a Final Reclamation and Stormwater inspection at Gulf Exploration LLC's Eagle Hill 1-32 Pad Location #466705 in Jackson County, Colorado.

The following compliance issues were observed during this inspection:

- Noxious weeds: cheatgrass
- Reclamation: uniform perennial vegetation not established
- Stormwater: BMP maintenance necessary

Refer to the "Location," "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.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

| | | | |
|--------------------|--|--|-------------------------|
| Type | WEEDS | | |
| Comment: | <p>Cheatgrass (CO List C Noxious Weeds) is common and widespread on portions of the Location and access road. In some areas it is the dominant plant species. Refer to the photos and transect datasheet attached to this inspection report.</p> <p>At the time of this inspection, cheatgrass has gone to seed. Operator must determine the appropriate measures (type and timing) to manage cheatgrass. A corrective action date of 11/15/2022 is being given for initial action, however, continued management is necessary to replace cheatgrass with desirable perennial species.</p> | | |
| Corrective Action: | <p>Comply with Rules 1004.d and 1004.e. Conduct weed management to prevent further establishment and spread of noxious weeds; ongoing weed management required until location passes final reclamation.</p> | | Date: <u>11/15/2022</u> |

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: 466705 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 466706 Type: WELL API Number: 057-06625 Status: DG 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 _____

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? _____

Comment

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 _____ In _____

Non cropland: Revegetated 80% _____ In _____ Cropland: perennial forage _____

Weeds present **Fail** _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% 21
 TRANSECT RESULTS OF REFERENCE AREA% 46
 TOTAL % OF DESIRABLE VEGETATION COVER 46
 VEGETATIVE COVER FAIL

Comment:

Refer to the "Location" section of this inspection report for weed control corrective action.

This location does not meet reclamation requirements; insufficient perennial vegetative cover on the Location and access road. Transects were conducted indicating vegetation is not 80% of the surrounding reference area. See attached transect data results and photos. Establishment of seeded species varies throughout the Location. Some areas have good establishment, others have poor establishment and high cover of bare ground and annual weeds. Action is necessary to establish uniform perennial vegetation.

Corrective Action:

Conduct additional reclamation in accordance with COGCC 1000 series rules. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. Revegetation activities shall be completed no later than 11/15/2022.

Date 11/15/2022

Overall Final Reclamation In Process 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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Seeding | In Process | Seeding | In Process | | | |
| | | Blankets | Pass | | | |
| Waddles | Pass | Waddles | In Process | | | |
| Mulching | Pass | Mulching | Pass | | | |

Comment:

At the time of this inspection, stormwater and sediment control BMPs have been installed per good engineering practices. Most BMPs appear to be in proper functioning condition, however, some degradation is apparent; water is beginning to cut beneath wattles. BMP maintenance is necessary until long-term stabilization has been achieved and site has received a passing final reclamation inspection.

Corrective Action:

Install or repair required BMPs per Rule 1002.f.

Date: 11/15/2022

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

| Comment | User | Date |
|--|----------|------------|
| Notice of Alleged Violation (NOAV) #402287805 issued for this Location for Rule 1002.f Stormwater Management and Rule 210 Signs and Markers. Administrative Order by Consent (AOC) 200700208/1V-766. | omalleya | 09/23/2022 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|--------------------|---|
| 702800729 | Transect Datasheet | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5868707 |
| 702800730 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5868708 |