

**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:

10/11/2022

Submitted Date:

10/18/2022

Document Number:

702800825

FIELD INSPECTION FORM

Loc ID 313095 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: 90450
 Name of Operator: TRUE OIL LLC
 Address: P O BOX 2360
 City: CASPER State: WY Zip: 82601

Findings:

- 8 Number of Comments
- 1 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
Hendricks, Wallace	(307) 266-0414	wallace.hendricks@truecos.com	All Inspections
Roberts, James		j75rober@blm.gov	WRFO, LSFO, KFO Inspections
Fanto, John	(307) 266-0222	john.fanto@truecos.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
223588	WELL	PA	07/18/2016	GW	081-06955	CADDIS FEDERAL 33-9	RI
313095	LOCATION	CL			-	CADDIS FEDERAL-611N91W 9NWSE	RI

General Comment:

On 10/11/2022, Reclamation Specialist O'Malley conducted a final reclamation and stormwater inspection at True Oil LLC's CADDIS FEDERAL-611N91W/9NWSE #313095 in Moffat County, Colorado.

The following compliance issues were observed during this inspection:

- 1004 Final Reclamation: Road and Location not achieving 1004 standards

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: 223588 Type: WELL API Number: 081-06955 Status: PA Insp. Status: RI

Facility ID: 313095 Type: LOCATION API Number: - Status: CL 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? _____

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: _____

Reminder: _____

Comment:

Well plugged Pass Pit mouse/rat holes, cellars backfilled Pass

Debris removed Pass No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed Pass

Gravel removed Pass

Location and associated production facilities reclaimed Pass Locations, facilities, roads, recontoured Pass

Compaction alleviation _____ Dust and erosion control In

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present Pass Subsidence Pass

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% 23
 TRANSECT RESULTS OF REFERENCE AREA% 40
 TOTAL % OF DESIRABLE VEGETATION COVER 58
 VEGETATIVE COVER FAIL

Comment:

This location does not meet reclamation requirements; access road remains, insufficient vegetative cover.

Vehicles are utilizing the road, vegetation growth is absent in tire tracks where soils are compacted and bare. The access road must be reclaimed per Rule 1004.a. Transects were conducted on the Location indicating vegetation is not 80% of the surrounding reference area. See attached transect data results and photos.

Corrective Action:

Comply with 1004 Rules.

Date 11/30/2022

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 on the Location and access road. 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 11/30/2022.

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		Seeding				

Comment: At the time of this inspection no stormwater issues were observed.

Corrective Action:

Date:

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
If the Location receives an approved Final Abandonment Notice (FAN) from the BLM, the Operator shall submit it to COGCC attached to a "Final Reclamation Complete" Form 4 Sundry.	omalleya	10/18/2022
Note: Operator is encouraged to consider BLM species diversity requirements when conducting additional reclamation. Refer to attached Transect Datasheet; Thinopyrum sp. dominates the plant community. COGCC does not enforce BLM regulations.	omalleya	10/18/2022

Attached Documents

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

Document Num	Description	URL
702800826	Transect Datasheet	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889876
702800827	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889877