

**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
Roberts, James		j75rober@blm.gov	<a href="#">WRFO, LSFO, KFO Inspections</a>
Fanto, John	(307) 266-0222	john.fanto@truecos.com	<a href="#">All Inspections</a>
Hendricks, Wallace	(307) 266-0414	wallace.hendricks@truecos.com	<a href="#">All Inspections</a>

**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:

	<p>This location does not meet reclamation requirements; access road remains, insufficient vegetative cover.</p> <p>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.</p>	
Corrective Action:	<p><b>Comply with 1004 Rules.</b></p> <p>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.</p>	Date <b>11/30/2022</b>
<p>Overall Final Reclamation <input type="checkbox"/> In Process <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/></p>		

**Storm Water:**

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

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Pits:**     NO SURFACE INDICATION OF PIT

<b>COGCC Comments</b>		
Comment	User	Date
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
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

**Attached Documents**

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

Document Num	Description	URL
403201444	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889880">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889880</a>
702800826	Transect Datasheet	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889876">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889876</a>
702800827	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889877">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5889877</a>