

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:

10/11/2022

Submitted Date:

10/19/2022

Document Number:

702800830

FIELD INSPECTION FORM

 Loc ID 313004 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: 44350
 Name of Operator: J W OPERATING COMPANY
 Address: 16479 N DALLAS PWY STE 850 LB8
 City: ADDISON State: TX Zip: 75001
Findings:

- 5 Number of Comments
2 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 |
|--------------|-------|--------------------|-----------------|
| Julie Walker | | jwalker@milmen.com | All Inspections |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|--------------------------------|-------------|
| 223260 | WELL | PA | 03/14/2011 | OW | 081-06624 | BATTLE MOUNTAIN 2-20 | RI |
| 313004 | LOCATION | CL | | | - | BATTLE MOUNTAIN-612N91W 20NESW | RI |

General Comment:

On 10/11/2022, Reclamation Specialist O'Malley conducted a final reclamation and stormwater inspection at J W Operating Company's BATTLE MOUNTAIN-612N91W/20NESW #313004 in Moffat County, Colorado.

This is a follow up to previous inspection #692400208 to document compliance with corrective actions. Corrective actions from previous inspection have not been addressed.

The following compliance issues were observed during this inspection:

- 1004 Final Reclamation: Road and Location not reclaimed per 1004 Rules and vegetation not progressing towards 1004 standards

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.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

| | | | |
|--------------------|---|--|------------------|
| Type | DEBRIS | | |
| Comment: | Trash/debris/old equipment remains on Location including a tube/pipe, anchor marker and anchor (see attached photos). | | |
| Corrective Action: | Comply with Rule 1004.a. Remove all trash/debris/equipment. | | Date: 11/02/2022 |

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: 223260 Type: WELL API Number: 081-06624 Status: PA Insp. Status: RI

Facility ID: 313004 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 _____

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 Fail No disturbance /Location never built _____

Access Roads Regraded Pass Contoured Pass Culverts removed Pass

Gravel removed Pass

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

Compaction alleviation Fail Dust and erosion control Fail

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

Weeds present Fail Subsidence Pass

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

Comment:

| | | |
|---------------------------|--|---|
| | <p>It was observed in this inspection that the Location has not been reclaimed per 1004 Rules; trash/debris and equipment remains: Refer to the Location section of this inspection report for corrective action. It does not appear that the Location has been properly decompacted. Revegetation has failed; bare ground and annual noxious weeds and undesirable plant species dominate the plant community. Perennials are rare.</p> <p>Corrective actions from previous inspection do not appear to have been addressed. Refer to document #692400208 for details. Previous corrective actions and date remain applicable. Corrective actions should be addressed immediately. Ongoing monitoring and management of site is required until passing final reclamation.</p> | |
| Corrective Action: | <p>Corrective Action #1: Control weeds.</p> <p>Corrective Action #2: Assess vegetation in Fall 2018; reseeding / inter-seeding/ applying remedies as indicated where desirable vegetation is not progressing.</p> | Date 11/30/2018 |
| Overall Final Reclamation | Fail | Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/> |

Storm Water:

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|--------------------|---|-------------------------|-----------------------|---------------|--------------------------|-------------|
| Seeding | Fail | | | | | |
| Comment: | <p>At the time of this inspection no stormwater issues were observed. No stormwater or erosion control BMPs observed. Seeding has failed.</p> | | | | | |
| Corrective Action: | | | | | | Date: _____ |
| Pits: | <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT | | | | | |

Attached Documents

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

| Document Num | Description | URL |
|--------------|----------------------|---|
| 403202540 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5890723 |
| 702800831 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5890717 |