

**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:

01/13/2023

Submitted Date:

01/17/2023

Document Number:

696105679

FIELD INSPECTION FORMLoc ID 474453 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 81490

Name of Operator: ST CROIX OPERATING INC

Address: P O BOX 13799

City: DENVER State: CO Zip: 80201

Status Summary:

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

Findings:

8 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
Arthur, Denise		denise.arthur@state.co.us	
Melnychenko, Paul	(303) 489-9298	stcroixexp@aol.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
474452	WELL	AP	08/15/2022	LO	121-11094	ALICE SEEDORF 1	CI

General Comment:

This is a follow-up Construction and Stormwater Inspection in response to Form 42: Notice of Construction- Document #403279581.

Location**Lease Road:**

Type	Access		
comment:	Operator provided an updated access road map on 01/11/2023 (Doc #403285876). The CA identified in the previous inspection (Doc #696105676) has been resolved.		
Corrective ActionL		Date:	

Overall Good: ☐**Emergency Contact Number:**

Comment:		Date: _____
Corrective Action:		

Overall Good: ☐**Spills:**

Type	Area	Volume		
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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: 474453 CDP: _____

Comment: Operator posted a location sign at the entrance to the location, with an approved copy of the Form 2A. The CA identified in the previous inspection (Doc # 696105676) has been resolved.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: _____

Corrective Action: _____ Date: _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities									
Facility ID:	474452	Type:	WELL	API Number:	121-11094	Status:	AP	Insp. Status:	CI

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Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: DRY LAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____ Fail _____

Comment _____

This location does not comply with Rule 1002.b. During this inspection, COGCC Staff observed an open excavation near the center portion of the location illustrating that approximately 2-4" of topsoil remained on location. Additionally, it appears the operator used topsoil as fill material throughout the location. COGCC staff estimates there was approximately 9" of topsoil on location prior to construction based on desktop review and observations of topsoil not salvaged at the time of this inspection. The Operator states they have removed approximately 5" of topsoil at the time of this inspection. This location will remain out of compliance until all topsoil has been removed and segregated. Refer to attached inspection photos.

Corrective Action _____

Comply with Rule 1002.b. Operator shall remove and segregate all topsoil on location, including any/all topsoil used as fill material. Provide topsoil stockpile data (size of stockpile, volume, etc) and photo documentation of topsoil removal in the Field Inspection Report Resolution (FIRR) form.

Corrective action date is the date the location was observed out of compliance.

Date **01/13/2023**

1002c. PROTECTION OF SOILS _____ In Process _____

Comment _____

Topsoil has been temporarily stabilized with equipment tracking for short-term stabilization. Operator shall implement long-term stabilization BMPs (i.e., seeding when appropriate) when stabilizing all stockpiles to ensure compliance under Rule 1002.c.

Per Rule 1002.c., all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations.

This is being left "In-Process" as the operator is required to salvage all topsoil on location (See 1002.b comments).

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____ Pass _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____ Pass _____

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 [Operator shall comply with interim reclamation timing requirements.](#)

Corrective Action _____

Date _____

Overall Interim Reclamation**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: DRY LAND _____

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 ☐**Storm Water:**

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

Comment: Operator has installed stormwater and erosion control BMPs during the construction phase of the location as a perimeter ditch and berm with two sediment traps were observed. However, the sediment traps and portions of the ditch and berm were comprised of unconsolidated material and are not properly stabilized. An unconsolidated BMP is not a proper functioning BMP, as the unconsolidated material becomes a source of potential pollution itself. Operator shall ensure this BMP is properly stabilized as it could be susceptible to wind and water erosion. Refer to attached inspection photos.

Corrective Action: Comply with Rule 1002.f.(2) to install and maintain BMPs in accordance with good engineering practices. Corrective action date is the date the location was observed out of compliance as the location should be in compliance at all times.

Date: 01/13/2023

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices.	edwardsond	01/17/2023

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

Document Num	Description	URL
696105680	Inspection Photos	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5986590