

**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:

02/02/2023

Submitted Date:

02/07/2023

Document Number:

696105712

**FIELD INSPECTION FORM**Loc ID 482780 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:**

5 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
Dornbos, Ryan	303-915-9074	ryan@petersonenergyoperating.com	
Melnychenko, Paul	(303) 489-9298	stcroixexp@aol.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482780	LOCATION	AC			-	Horseshoe 1	RI
483051	WELL	DG	12/12/2022		121-11098	Horseshoe 1	RI

**General Comment:**

This is a Follow-up Final Reclamation and Stormwater Inspection for PA Well API#121-11098.

Inspected Facilities									
Facility ID:	<u>482780</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>	
Facility ID:	<u>483051</u>	Type:	<u>WELL</u>	API Number:	<u>121-11098</u>	Status:	<u>DG</u>	Insp. Status:	<u>RI</u>

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

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: IRRIGATED

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

This corrective action has not been completed and the location is out of compliance with Rule 1002.b. The operator has provided conflicting information in the FIRR (Doc #403302335) and has explained that 6" of topsoil was removed from a 300'x300' working pad surface for a total of 1,667 cubic yards. However, Staff calculated the actual disturbance area of the location to be approximately 400' x 390', and that approximately 5,801 cubic yards of topsoil should have been salvaged based on the disturbance area of 3.61 acres, as a topsoil depth of 12" (A and AC Horizon) was indicated in the previous inspection (Doc #696105675). Refer to attached inspection photos for documentation.

Corrective Action \_\_\_\_\_

This location should have been in compliance during the construction phase. At this stage, if this location does not restore properly following the first growing season after seeding, the Operator will be required to import new topsoil to ensure that the location reaches uniform vegetation cover in accordance with 1004 Rules.

Corrective action date is being backdated to when the location was first observed out of compliance with Rule 1002.b.

Date **01/09/2023**

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

This corrective action has not been completed and the location is out of compliance with Rule 1002.c. Topsoil stockpiles did not have any evidence of protections against wind and/or water erosion at the time of this inspection. Staff observed that wind erosion was evident near the stockpiles during this inspection. The stockpiles remain unconsolidated and not properly stabilized. Refer to attached inspection photos.

Corrective Action \_\_\_\_\_

Comply with Rule 1002.c. Corrective action date is the date the location was observed out of compliance.

Date **01/09/2023**

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: IRRIGATED \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ In \_\_\_\_\_

Pit mouse/rat holes, cellars backfilled \_\_\_\_\_ In \_\_\_\_\_

Debris removed \_\_\_\_\_

No disturbance /Location never built \_\_\_\_\_

Access Roads \_\_\_\_\_ Regraded \_\_\_\_\_ In \_\_\_\_\_

Contoured \_\_\_\_\_ In \_\_\_\_\_

Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ In \_\_\_\_\_

Locations, facilities, roads, recontoured \_\_\_\_\_ In \_\_\_\_\_

Compaction alleviation \_\_\_\_\_

Dust and erosion control **Fail** \_\_\_\_\_

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:	At the time of this inspection, it does not appear any further reclamation work has been performed since the previous inspection (Doc #696105675) due to snow accumulation in the area. Operator shall comply with 1004 Rules for final reclamation activities and timing requirements.					
Corrective Action:						Date _____
Overall Final Reclamation      In Process      Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>						
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment:	Corrective action has not been completed and this location does not comply with Rule 1002.f. During this inspection no stormwater or erosion control BMPs were observed around the perimeter of the location, or downslope areas on the eastern portion of the location, or around any stored soil stockpiles. Operator needs to install sufficient erosion and stormwater control BMPs in accordance with good engineering practices, immediately. Refer to attached inspection photos for documentation.					
Corrective Action:	<p>Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.</p> <p>The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.</p>					Date: 01/09/2023
<b>Pits:</b> <input 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
403314980	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6012912">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6012912</a>
696105715	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6012910">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6012910</a>