



MEMORANDUM

TO: C. Michael Jackson (BP America Production Co), Scott McDonald (BP America Production Co)

CC: Lucas Hellerich (W&C)

FROM: Kirk Silver (W&C)

DATE: July 14, 2023

RE: MGP Enterprise - July 2023 Site Inspection

This memorandum summarizes observations conducted during the July 13, 2023 inspection at the MGP Enterprises A-4 well pad (site). The site is located approximately 20 miles west of Trinidad, Colorado in Las Animas County on the privately owned Hill Ranch. Woodard & Curran (W&C) conducted an inspection to monitor vegetation establishment, slope stability/soil erosion, and adverse amounts of moisture or drought. This is the first monthly inspection after reclamation construction activities concluded on June 29, 2023.

Summary

The team recorded observations related to:

- BMPs installed during June construction
- Vegetation growth
- Erosion features
- Condition of drainage structures
- General site conditions

Photographs were captured in the same locations as the previous site inspection for visual comparisons of the site over time. In addition to ground photos, an unmanned aerial vehicle (i.e., drone) was flown to capture aerial imagery.

A Stormwater Inspection was completed following the authorized Water Quality Control Division permit. The frequency of inspections was reduced to once every 30 days in accordance with the Stormwater Management Plan. There was no precipitation at the nearest weather station in the two weeks prior to the site inspection.

A summary of recorded observations is included below and a photographic log is attached to this memorandum. The next inspection is anticipated to occur in mid-August 2023, pending inclement weather.

No maintenance is recommended at this time.



Well Pad and Cut Slope

The well pad is generally in good condition with a berm installed along the western and southern edges (see Photos 1 and 2). The pad was regraded to reduce flow to the western slope and redirected to riprap channels on the northwestern and southeastern boundaries (see Photos 1 and 2).

The cut slope appears stable with new grass and shrub growth and little to no erosion.

Western Slope

The western slope has new visible growth, mainly of grasses. Growth is limited in various areas where erosion was most severe prior to reclamation construction. Very minor erosion rills were present in select locations where sediment logs overlap and cause points of weakness, but the western slope is generally free of rills (see Photos 3-5). The rills do not appear to have worsened since the construction concluded. In addition, sedimentation at the bottom of the slope (see Photo 7) has not increased since the last inspection. The silt fence is in good condition. The sediment logs were in good condition (see Photos 5 and 6) and do not require any maintenance at this time.

The riprap installed on the northwestern and northeastern portions of the slope remain in good condition.

Southern Slope

The southern slope presented limited new grass growth. The erosion rills observed during the last inspection were filled in during construction and four rows of sediment logs were installed (see Photos 9 and 10). The sediment logs were in good condition and do not require any maintenance at this time. Additional riprap was placed on the eastern edge of the slope where water is channeled from the southern half of the well pad.

The extended riprap east of the slope remains in good shape since its installation.

Access Road

The access road is generally in good condition, with little to no evidence of erosion since it was re-graded (see Photos 14-16).



Photo Number: 1	Direction of camera: Southeast	Date: 7/13/2023
Description: Drone photo of western slope		



Photo Number: 2	Direction of camera: Northeast	Date: 7/13/2023
Description: Drone photo of western slope		



Photo Number: 3	Direction of camera: West	Date: 7/13/2023
Description: Drone photo of western slope		



Photo Number: 4	Direction of camera: Southwest	Date: 7/13/2023
Description: Ground photo of western slope		

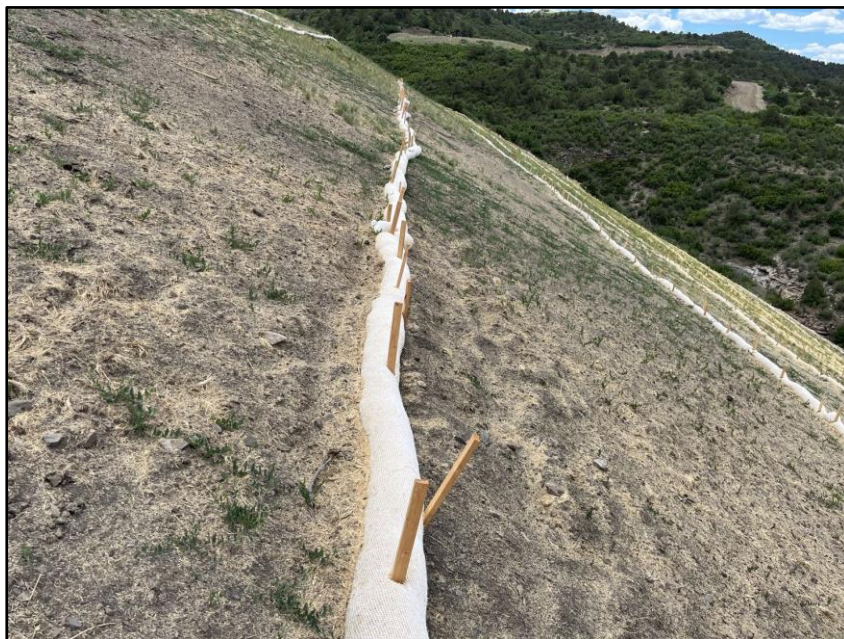


Photo Number: 5	Direction of camera: South	Date: 7/13/2023
Description: Ground photo of western slope		



Photo Number: 6	Direction of camera: Southwest	Date: 7/13/2023
Description: Ground photo of straw wattles by top of western slope		



Photo Number: 7	Direction of camera: North	Date: 7/13/2023
Description: Drone photo of bottom of western slope		



Photo Number: 8	Direction of camera: Northwest	Date: 7/13/2023
Description: Ground photo of well pad		



Photo Number: 9	Direction of camera: South	Date: 7/13/2023
Description: Drone photo of southern slope		



Photo Number: 10	Direction of camera: North	Date: 7/13/2023
Description: Drone photo southern slope		



Photo Number: 11	Direction of camera: North	Date: 7/13/2023
Description: Drone photo of western slope		



Photo Number: 12	Direction of camera: South	Date: 7/13/2023
Description: Ground photo of western slope		



Photo Number: 13	Direction of camera: Northeast	Date: 7/13/2023
Description: Ground photo of southern slope		



Photo Number: 14	Direction of camera: Northeast	Date: 7/13/2023
Description: Drone photo of road entrance to well pad		



Photo Number: 15	Direction of camera: North	Date: 7/13/2023
Description: Drone photo of access road		



Photo Number: 16	Direction of camera: North	Date: 7/13/2023
Description: Drone photo of access road		

Stormwater Inspection Report Template

Facility Name		Permittee	
Date of Inspection		Weather Conditions	
Permit Certification #		Disturbed Acreage	
Phase of Construction		Inspector Title	
Inspector Name			
Is the above inspector a qualified stormwater manager? (permittee is responsible for ensuring that the inspector is a qualified stormwater manager)			<div>YES</div> <input type="checkbox"/>
			<div>NO</div> <input type="checkbox"/>

INSPECTION FREQUENCY

Check the box that describes the minimum inspection frequency utilized when conducting each inspection

At least one inspection every 7 calendar days	<input type="checkbox"/>
At least one inspection every 14 calendar days, with post-storm event inspections conducted within 24 hours after the end of any precipitation or snowmelt event that causes surface erosions	<input type="checkbox"/>
<ul style="list-style-type: none"> This is this a post-storm event inspection. Event Date: _____ 	<input type="checkbox"/>
Reduced inspection frequency - Include site conditions that warrant reduced inspection frequency	<input type="checkbox"/>
<ul style="list-style-type: none"> Post-storm inspections at temporarily idle sites 	<input type="checkbox"/>
<ul style="list-style-type: none"> Inspections at completed sites/area 	<input type="checkbox"/>
<ul style="list-style-type: none"> Winter conditions exclusion 	<input type="checkbox"/>
Have there been any deviations from the minimum inspection schedule? If yes, describe below.	<div>YES</div> <input type="checkbox"/>
	<div>NO</div> <input type="checkbox"/>

INSPECTION REQUIREMENTS*

i. Visually verify all implemented control measures are in effective operational condition and are working as designed in the specifications
ii. Determine if there are new potential sources of pollutants
iii. Assess the adequacy of control measures at the site to identify areas requiring new or modified control measures to minimize pollutant discharges
iv. Identify all areas of non-compliance with the permit requirements, and if necessary, implement corrective action
*Use the attached Control Measures Requiring Routine Maintenance and Inadequate Control Measures Requiring Corrective Action forms to document results of this assessment that trigger either maintenance or corrective actions

AREAS TO BE INSPECTED

Is there evidence of, or the potential for, pollutants leaving the construction site boundaries, entering the stormwater drainage system or discharging to state waters at the following locations?

	NO	YES	If "YES" describe discharge or potential for discharge below. Document related maintenance, inadequate control measures and corrective actions Inadequate Control Measures Requiring Corrective Action form
Construction site perimeter	<input type="checkbox"/>	<input type="checkbox"/>	
All disturbed areas	<input type="checkbox"/>	<input type="checkbox"/>	
Designated haul routes	<input type="checkbox"/>	<input type="checkbox"/>	
Material and waste storage areas exposed to precipitation	<input type="checkbox"/>	<input type="checkbox"/>	
Locations where stormwater has the potential to discharge offsite	<input type="checkbox"/>	<input type="checkbox"/>	
Locations where vehicles exit the site	<input type="checkbox"/>	<input type="checkbox"/>	
Locations of installed control measures	<input type="checkbox"/>	<input type="checkbox"/>	

CONTROL MEASURES REQUIRING ROUTINE MAINTENANCE

Definition: Any control measure that is still operating in accordance with its design and the requirements of the permit, but requires maintenance to prevent a breach of the control measure. These items are not subject to the corrective action requirements as specified in Part I.B.1.c of the permit.

Are there control measures requiring maintenance?	NO	YES	
	<input type="checkbox"/>	<input type="checkbox"/>	If "YES" document below

[illegible]

Definition: Any control measure that is not designed or implemented in accordance with the requirements of the permit and/or any control measure that is not implemented to operate in accordance with its design. This includes control measures that have not been implemented for pollutant sources. If it is infeasible to install or repair the control measure immediately after discovering the deficiency the reason must be documented and a schedule included to return the control measure to effective operating condition as possible.

Are there additional control measures needed that were not in place at the time of inspection?	NO	YES	
	<input type="checkbox"/>	<input type="checkbox"/>	If "YES" document below

[illegible]

REPORTING REQUIREMENTS

The permittee shall report the following circumstances orally within twenty-four (24) hours from the time the permittee becomes aware of the circumstances, and shall mail to the division a written report containing the information requested within five (5) working days after becoming aware of the following circumstances. The division may waive the written report required if the oral report has been received within 24 hours.

All Noncompliance Requiring 24-Hour Notification per Part II.L.6 of the Permit		
a. Endangerment to Health or the Environment Circumstances leading to any noncompliance which may endanger health or the environment regardless of the cause of the incident (See Part II.L.6.a of the Permit) <i>This category would primarily result from the discharge of pollutants in violation of the permit</i>		
b. Numeric Effluent Limit Violations <ul style="list-style-type: none"> ○ Circumstances leading to any unanticipated bypass which exceeds any effluent limitations (See Part II.L.6.b of the Permit) ○ Circumstances leading to any upset which causes an exceedance of any effluent limitation (See Part II.L.6.c of the Permit) ○ Daily maximum violations (See Part II.L.6.d of the Permit) <i>Numeric effluent limits are very uncommon in certifications under the COR400000 general permit. This category of noncompliance only applies if numeric effluent limits are included in a permit certification.</i>		

Has there been an incident of noncompliance requiring 24-hour notification?	NO	YES	
	<input type="checkbox"/>	<input type="checkbox"/>	If "YES" document below

Date and Time of Incident	Location	Description of Noncompliance	Description of Corrective Action	Date and Time of 24 Hour Oral Notification	Date of 5 Day Written Notification *

*Attach copy of 5 day written notification to report. Indicate if written notification was waived, including the name of the division personnel who granted waiver.

"I verify that, to the best of my knowledge and belief, all corrective action identified during the inspection are complete, and the site is currently in compliance with the permit."

Name of Qualified Stormwater Manager

Title of Qualified Stormwater Manager

Signature of Qualified Stormwater Manager

Date

Notes/Comments

--