

**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:

07/20/2023

Submitted Date:

07/21/2023

Document Number:

696205116

FIELD INSPECTION FORM

Loc ID 478266	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 15 Number of Comments 9 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: 10456 Name of Operator: CAERUS PICEANCE LLC Address: 1001 17TH STREET #1600 City: DENVER State: CO Zip: 80202				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
		al.stafford@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arauz, Steven		steven.arauza@state.co.us	
		joseph.campbell@state.co.us	
		COGCC.inspections@caerus oilandgas.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478246	WELL	AP	10/17/2022	LO	045-24364	BJU M23A FED 26A-22-496	CI
478247	WELL	AP	10/17/2022	LO	045-24365	BJU M23A FED 13B-22-496	CI
478248	WELL	AP	10/17/2022	LO	045-24366	BJU M23A FED 24A-22-496	CI
478249	WELL	AP	10/17/2022	LO	045-24367	BJU M23A FED 24D-23-496	CI
478250	WELL	AP	10/17/2022	LO	045-24368	BJU M23A FED 24B-22-496	CI
478251	WELL	AP	10/17/2022	LO	045-24369	BJU M23A FED 15B-23-496	CI
478252	WELL	AP	10/17/2022	LO	045-24370	BJU M23A FED 13D-23-496	CI
478253	WELL	AP	10/17/2022	LO	045-24371	BJU M23A FED 12C-23-496	CI
478254	WELL	AP	10/17/2022	LO	045-24372	BJU M23A FED 25A-23-496	CI
478255	WELL	AP	10/17/2022	LO	045-24373	BJU M23A FED 13C-23-496	CI
478256	WELL	AP	10/17/2022	LO	045-24374	BJU M23A FED 25B-22-496	CI
478257	WELL	AP	10/17/2022	LO	045-24375	BJU M23A FED 15A-23-496	CI
478258	WELL	AP	10/17/2022	LO	045-24376	BJU M23A FED 14A-23-496	CI
478259	WELL	AP	10/17/2022	LO	045-24377	BJU M23A FED 24D-22-496	CI

478260	WELL	AP	10/17/2022	LO	045-24378	BJU M23A FED 15C-23-496	CI
478261	WELL	AP	10/17/2022	LO	045-24379	BJU M23A FED 23D-22-496	CI
478262	WELL	AP	10/17/2022	LO	045-24380	BJU M23A FED 25B-23-496	CI
478263	WELL	AP	10/17/2022	LO	045-24381	BJU M23A FED 21B-26-496	CI
478264	WELL	AP	10/17/2022	LO	045-24382	BJU M23A FED 25C-23-496	CI
478265	WELL	AP	10/17/2022	LO	045-24383	BJU M23A FED 25C-22-496	CI
478266	LOCATION	AC			-	BJU M23A-496 Pad	CI
478267	WELL	DG	06/25/2023	LO	045-24384	BJU M23A FED 12A-23-496	CI
478268	WELL	AP	10/17/2022	LO	045-24385	BJU M23A FED 25D-22-496	CI
478269	WELL	AP	10/17/2022	LO	045-24386	BJU M23A FED 13A-23-496	CI
478270	WELL	AP	10/17/2022	LO	045-24387	BJU M23A FED 14D-23-496	CI
478271	WELL	AP	10/17/2022	LO	045-24388	BJU M23A FED 12B-23-496	CI
478272	WELL	DG	07/12/2023	LO	045-24389	BJU M23A FED 12D-23-496	CI
478273	WELL	AP	10/17/2022	LO	045-24390	BJU M23A FED 24C-22-496	CI

General Comment:

On 7/20/2023, Reclamation Specialist Trujillo conducted construction and stormwater inspection at Caerus Piceance LLC's SG L24 496 location in Garfield County, Colorado.

This inspection is a follow-up to #696203996 to document compliance with the following compliance issues:

-Location Signage.

This inspection is also in response to Resolution #403197232 stating sign was installed.

It was observed in this inspection that the corrective action has not been addressed.

The following new compliance issues were observed during this inspection:

- Spills
- Stormwater
- Improper Materials Management
- Form 2A posting requirements
- Form 2A conditions
- Management of Drill Cuttings

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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	<p>Pursuant to Rule 605.a, from the time of construction until Reclamation is complete, the Operator will post a sign at the entrance to an Oil and Gas Location.</p> <p>Inspection #696203996 observed that the required signage had not been posted at time of construction. Inspection required Operator to comply with Rule 605.a.</p> <p>It was observed in this inspection that signage remains missing from the Location entrance. This corrective action has not been resolved and remains applicable.</p>		
Corrective Action:	Comply with Rule 605.a	Date:	07/20/2023
Type	OTHER		
Comment:	<p>Pursuant to Rule 406.c, a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim Reclamation.</p> <p>At time of inspection the Form 2A was not posted, and Operator on site was unable to provide the required permit upon request. Operator was eventually able to print an emailed copy of the permit upon the conclusion of the inspection, however it is being noted that Operator failed to comply with 406 posting requirements.</p>		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good: ☐

Spills:			
Type	Area	Volume	
Comment:	Improper materials management has resulted in several spills onto the southeastern working pad surface.		
Corrective Action:	Clean/remediate impacted soils due to materials spilled onto the working pad surface to table 915-1 standards; Comply with Rule 1002.f and implement proper materials handling and spill prevention procedures and practices.		Date: 07/20/2023
Comment:	Stained soils observed throughout Location, including areas of the "Dyed Diesel" tank on the north end of the Location, and areas of the drill rig.		
Corrective Action:	Clean/remediate stained soils to table 915-1 standards.		Date: 07/20/2023
Comment:	<p>It was observed in this inspection that Operator has spilled an unknown substance onto the fill slope, on the west end of the Location; spill is approximately 7,069 square feet in size; material will require identification, reporting if applicable and cleanup.</p> <p>It was also observed that the Operator has spilled drill cutting material onto approximately 0.5 acres of the working pad surface. It was also observed that Operator has driven through the spilled material and potentially tracked the E&P waste off-location; this issue is being considered a spill and will require reporting, documentation of cleanup and remediation in accordance with Rule 912 requirements and 915-1 standards.</p>		
Corrective Action:	Contact NW EPS Arauza. Submit a Form 19 for Spill/Release Report, and a Form 27 for remediation of Drill Cuttings spilled onto the working pad surface of the Location.		Date: 07/22/2023
Other			

Comment:	Crews were observed pressure washing equipment on the north end of the Location, and appeared to be washing Non-E&P oily materials, with wash fluids being drained onto the working pad surface.		
Corrective Action:	Comply with Rule 906 and notify CDPHE regarding the improper management of POLS (Petroleum, Oil and Lubricants).	Date:	07/20/2023

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: 478266 CDP: _____

Comment: Pursuant to Form 2A #402340830, the permitted area of disturbance for this Location is 11.12 acres. With use of a sUAS, the Location's disturbance area was calculated to be 11.19 acres.

Corrective Action:

Date:

Form 2A COAs:

Comment:

Corrective Action:

Date:

Wildlife BMPs:

Comment:

Corrective Action:

Date:

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
		Vehicle Tracking	No

Comments: Erosion BMPs:

Other BMPs:

Vehicle tracking control at the location entrance has filled with sediment/material, and is not longer adequate to minimize off-site tracking.

Corrective Action: Comply with Rule 1002.f; install or repair vehicle track pad in accordance with good engineering practices.

Date: 07/20/2023

	Yes		
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Comments: Erosion BMPs:

Other BMPs:

Hydromulch- topsoil stockpiles.

Corrective Action:

Date:

	Covering Materials	No	
Comments: Erosion BMPs: <input style="width: 90%;" type="text"/>			
Other BMPs: Materials observed stored on the southwest end of the location lacked proper covering resulting in contact with precipitation.			
Corrective Action: Comply with Rule 1002.f and implement proper materials handling and spill prevention procedures and practices.			Date: 07/20/2023
	Material Handling And Spill Prevention	No	
Comments: Erosion BMPs: <input style="width: 90%;" type="text"/>			
Other BMPs: Two porta-john units on the northwest end of the Location unsecured; BMPs to prevent a spill, or to contain a spill if one were to occur are inadequate.			
Corrective Action: Comply with Rule 1002.f and implement proper materials handling and spill prevention procedures and practices.			Date: 07/20/2023
WADDLES	Yes		
Comments: Erosion BMPs: Erosion logs along perimeter of the Location's disturbance. Run-on controls. Base of topsoil stockpiles.			
Other BMPs: <input style="width: 90%;" type="text"/>			
Corrective Action: _____			Date: _____
Comments: Erosion BMPs: <input style="width: 90%;" type="text"/>			
Other BMPs: <input style="width: 90%;" type="text"/>			
Corrective Action: _____			Date: _____
BERMS	Yes		
Comments: Erosion BMPs: <input style="width: 90%;" type="text"/>			
Other BMPs: Perimeter berm of the working pad areas			
Corrective Action: _____			Date: _____
Comment: See "Comment #1" at the end of this report.			
Corrective Action: Comply with Form 2A permit conditions and Rule 1002.f; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.			Date: 07/20/2023
On Site Inspection (305):			
<u>Surface Owner Contact Information:</u>			
Name: _____		Address: _____	
Phone Number: _____		Cell Phone: _____	
<u>Operator Rep. Contact Information:</u>			
Landman Name: _____		Phone Number: _____	
Date Onsite Request Received: _____		Date of Rule 306 Consultation: _____	
Request LGD Attendance: _____			
<u>LGD Contact Information:</u>			
Name: _____		Phone Number: _____	
		Agreed to Attend: _____	
<u>Summary of Landowner Issues:</u>			

<u>Summary of Operator Response to Landowner Issues:</u>	
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>	

Inspected Facilities				
Facility ID: <u>478246</u>	Type: <u>WELL</u>	API Number: <u>045-24364</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478247</u>	Type: <u>WELL</u>	API Number: <u>045-24365</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478248</u>	Type: <u>WELL</u>	API Number: <u>045-24366</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478249</u>	Type: <u>WELL</u>	API Number: <u>045-24367</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478250</u>	Type: <u>WELL</u>	API Number: <u>045-24368</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478251</u>	Type: <u>WELL</u>	API Number: <u>045-24369</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478252</u>	Type: <u>WELL</u>	API Number: <u>045-24370</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478253</u>	Type: <u>WELL</u>	API Number: <u>045-24371</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478254</u>	Type: <u>WELL</u>	API Number: <u>045-24372</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478255</u>	Type: <u>WELL</u>	API Number: <u>045-24373</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478256</u>	Type: <u>WELL</u>	API Number: <u>045-24374</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478257</u>	Type: <u>WELL</u>	API Number: <u>045-24375</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478258</u>	Type: <u>WELL</u>	API Number: <u>045-24376</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478259</u>	Type: <u>WELL</u>	API Number: <u>045-24377</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478260</u>	Type: <u>WELL</u>	API Number: <u>045-24378</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478261</u>	Type: <u>WELL</u>	API Number: <u>045-24379</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478262</u>	Type: <u>WELL</u>	API Number: <u>045-24380</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478263</u>	Type: <u>WELL</u>	API Number: <u>045-24381</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>478264</u>	Type: <u>WELL</u>	API Number: <u>045-24382</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>

Facility ID:	478265	Type:	WELL	API Number:	045-24383	Status:	AP	Insp. Status:	CI
Facility ID:	478266	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI
Facility ID:	478267	Type:	WELL	API Number:	045-24384	Status:	DG	Insp. Status:	CI
Facility ID:	478268	Type:	WELL	API Number:	045-24385	Status:	AP	Insp. Status:	CI
Facility ID:	478269	Type:	WELL	API Number:	045-24386	Status:	AP	Insp. Status:	CI
Facility ID:	478270	Type:	WELL	API Number:	045-24387	Status:	AP	Insp. Status:	CI
Facility ID:	478271	Type:	WELL	API Number:	045-24388	Status:	AP	Insp. Status:	CI
Facility ID:	478272	Type:	WELL	API Number:	045-24389	Status:	DG	Insp. Status:	CI
Facility ID:	478273	Type:	WELL	API Number:	045-24390	Status:	AP	Insp. Status:	CI

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

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

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____ Pass _____

Comment With use of a sUAS, Operator apperas to have salvaged and stored approximately 20,817 cubic yards of topsoil material along the perimeter of the Location.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Pass _____

Comment Hydromulch application at the topsoil stockpile appeared to be in proper functioning condition at time of inspection. Hydromulch is being used in conjunction with erosion loges to ensure stockpiles remain protected ad segregated.

Corrective Action _____

Date _____

1002E. SURFACE DISTRURBANCE 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 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 _____

Corrective Action _____ Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

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 ☐

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>Pursuant to Form 2A #402340830 Conditions of Approval (“COAs”), the pad will be constructed as designed and shown on the Construction Layout Drawings; Stormwater BMPs will be installed per details in the Stormwater Management Plan (SWMP) and as shown on the Construction Layout Drawings.</p> <p>It was observed in this inspection that the Location has not been constructed as designed and shown by the Construction Layout Drawing (#402428071), and that the Location is out of compliance with Form 2A Permit Conditions.</p> <p>As identified in the Construction Layout Drawing:</p> <p>The 24" culvert to allow for stormwater discharge at the southern Location entrance has not been installed;</p> <p>The two, 6" Flex Pipes to allow for stormwater discharge at the northern Location entrance has not been installed;</p> <p>An “armor channel” to allow for stormwater discharge on the northeast end of the Location has not been installed;</p> <p>Velocity checks (check dams) not observed within stormwater diversion ditch;</p> <p>No armoring was observed within any channel, including the stormwater diversion ditch and sediment traps;</p> <p>Operator states Sediment Trap #2 is to be constructed with a volume of 5,796 cubic feet, to manage runoff from 1.61 acres of the pad- Sediment trap #2 has been constructed with a volume of 1,780 cubic feet, and is inadequate in size. Erosion degradation also observed at the inlet- the 3 sediment traps have not been constructed with an engineered inlet. Sediment traps have been installed in a manner that detains stormwater; any stormwater discharge that would exceed the capacity of the traps would impact the topsoil stockpiles.</p> <p>Additionally, it was observed that BMPs to minimize erosion and degradation from the cut and fill slopes are missing or insufficient; unstabilized fine soils observed on the cut/fill.</p>	trujilloam	07/21/2023

Attached Documents

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

Document Num	Description	URL
696205117	Photo documentation and issue report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6191477