

**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:

07/27/2023

Document Number:

696205118

**FIELD INSPECTION FORM**

Loc ID 479215 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**  
 THIS IS A FOLLOW UP INSPECTION  
 FOLLOW UP INSPECTION REQUIRED  
 NO FOLLOW UP INSPECTION REQUIRED

**Findings:**  
14 Number of Comments  
3 Number of Corrective Actions  
 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
,		COGCC.inspections@caerus oilandgas.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479215	LOCATION	AC	01/14/2021		-	ELU G13-496 Central Delivery Point Production Pad	CI

**General Comment:**

On 7/20/2023, Reclamation Specialist Trujillo inspected Caerus Piceance LLC's ELU G13-496 Central Delivery Point/Production Pad location in Rio Blanco County, Colorado.

This inspection is a follow-up to #696205077 to document compliance with the following compliance issues:

- Location Assessment requirements
- Location signage
- Protection of soils
- Stormwater

It was observed in this inspection, and after a review of the Form 2A permit requirements, that this Location remains out of compliance with Rules, Permit Conditions and Corrective actions

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.

**Location**

Overall Good:

Emergency Contact Number:

**Comment:** Pursuant to Rule 605.a, Location signage is required at the Location entrance from time of construction until Reclamation is complete. Previous inspections observed that required signage has not been posted at the Location entrance. Inspections required Operator to comply with Rule 605.a by 10/27/2022.

It was observed in this inspection that signage remains missing.

**Corrective Action:** Comply with Rule 605.a

**Date:** 10/27/2022

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

**Comment:**

Multiple Spills and Releases?

**Venting:**

Yes/No			
<b>Comment:</b>			
<b>Corrective Action:</b>		<b>Date:</b>	

**Flaring:**

Type		
<b>Comment:</b>		
<b>Corrective Action:</b>		<b>Date:</b>

**Location Construction**

Location ID: 479215 CDP: \_\_\_\_\_

**Comment:** Previous inspections observed that the Location 2A permit was not posted on the Location. It was observed in this inspection that the permit has been posted at the Location entrance within an "infotube".

**Corrective Action:**  **Date:** \_\_\_\_\_

**Form 2A COAs:**

**Comment:** Pursuant to Form 2A 402505441, permitted Location disturbance is 10.2 acres. With the use of a sUAS, it the Location's disturbance was measured to be ~10 acres.

**Corrective Action:**  **Date:** \_\_\_\_\_

**Wildlife BMPs:**

**Comment:** Location is out of compliance with Form 2A Stormwater COAs.

**Corrective Action:**  **Date:** \_\_\_\_\_

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
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BERMS	Yes		
Comments: Erosion BMPs: <span style="color:red;">Perimeter of the working pad.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action: _____		Date: _____	
		Vehicle Tracking	No
Comments: Erosion BMPs: <span style="color:red;">Tracking controls, such as a tracking pad at the location entrance(s), to minimize offsite sediment transport not observed on Location.</span>			
<span style="color:red;">Though tracking issues were not observed during inspection, it is unclear if BMPs to minimize tracking are adequate on Location during wet conditions. A followup inspection will be conducted to determine compliance with 1002.f requirements.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action: _____		Date: _____	
WADDLES	Yes		
Comments: Erosion BMPs: <span style="color:red;">Previous inspection observed erosion logs on Location have not been installed or maintained in accordance with good engineering practices. Inspection required Operator to comply with Rule 1002.f</span>			
<span style="color:red;">It was observed in this inspection that work to address the CA was in process, though not completed; many new erosion logs remain improperly installed. CA will remain applicable until addressed in its entirety.</span>			
Other BMPs: <span style="color:red;">Contractor on site was notified of the improper installation observations at time of inspection.</span>			
Corrective Action: <span style="color:red;">Comply with Rule 1002.f and install or maintain required BMPs in accordance with good engineering practices.</span>		Date: 06/28/2023	
	Yes	Material Handling And Spill Prevention	Yes
Comments: Erosion BMPs: <span style="color:red;">Two (2) porta-johns. Staked down/secured to prevent spill.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action: _____		Date: _____	

**Comment:** See "Stormwater Comments" 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):**

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: 479215 Type: LOCATION API Number: - Status: AC 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 Fail

Comment With use of a sUAS, Operator apperas to have salvaged and stored approximately 15, 413 cubic yards of topsoil material along the perimeter of the Location; soil salvage Operations appear to be sufficient.  
  
Previous inspection observed BMPs to stabilize and maintain segregation at the excavation on the south side of the Location were inadequate; BMPs remain inadequate. See "1002.c" below.

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

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS Fail

Comment Previous inspection observed that topsoil, and soil stockpile protections are inadequate on the Location.  
  
It was observed in this inspection that hydromulch has been applied to the topsoil stockpiles along the southwestern, western and northern perimeters.  
  
Control measures to stabilize, minimize erosion, degradation and sediment transport remain missing or insufficient at the topsoil stockpile adjacent to the southern Location entrance. Additionally, BMPs to minimize erosion, and mixing with subsoils remain missing, or insufficient at the topsoil from the excavated pipeline on the south end of the Location.  
  
CA has not been addressed and remains applicable.

Corrective Action Comply with Rule 1002.c and 1002.f

Date **06/28/2023**

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 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: 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: <input style="width: 90%;" type="text"/>	
Corrective Action: <input style="width: 90%;" type="text"/>	Date: <input style="width: 100%;" type="text"/>
Overall Final Reclamation <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

**COGCC Comments**

Comment	User	Date
<p><b>STORMWATER COMMENT</b></p> <p>Pursuant to Form 2A #402505441 Conditions of Approval (“COAs) the CDP Facility 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 (#402507020), 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 40 foot and 60 foot 18-inch CMP (“Corrugated Metal Pipe”, “Culverts”) have not been installed at the Location entrances;</p> <p>The 20 foot, 18 inch CMP Slope Drains to allow stormwater discharge from the northwest and southwest ends of the Location have not been installed;</p> <p>Sediment trap for “diversion water and south access” on the southern Location entrance not installed;</p> <p>Diversion Ditch on the southeast end of the Location not installed;</p> <p>8 foot wide “Spillways” with rip-rap have not been constructed at Stormwater Retention Ponds;</p> <p>Operator states that the “Stormwater design was for the 25-year 24 hour storm. There are two basins North and South. Required volume for North and South are 18,075 CF and 19,171 CF respectively. The volumes provided in the proposed ponds are 71,700 CF and 69,000 CF (140,700 cubic feet combined) for the north and south ponds with one foot of freeboard”.</p> <p>-Operator has constructed “retention ponds” on the southwest, northwest and north ends of the Location. Collectively, the ponds have a combined capacity of ~39,713 cubic feet; ponds inadequate in size based on Operators provided calculations;</p> <p>Additionally, it was observed that control measures to minimize erosion and degradation from the cut and fill slopes are missing or insufficient; Operator has only applied a hydromulch to select sections of the cut slopes; unstabilized fine soils observed on the slopes.</p>	trujilloam	07/27/2023

**Attached Documents**

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

Document Num	Description	URL
403479136	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6197363">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6197363</a>
696205119	Inspection Photos and Issue Report	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6197362">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6197362</a>