

**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:

08/21/2023

Submitted Date:

08/22/2023

Document Number:

696205178

FIELD INSPECTION FORMLoc ID 479215 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

City: DENVER State: CO Zip: 80202

Status Summary:

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

Findings:

14 Number of Comments

4 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
Noto, John		john.noto@state.co.us	
Arthur, Denise		denise.arthur@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
479215	LOCATION	AC	01/14/2021		-	ELU G13-496 Central Delivery Point Production Pad	CI

General Comment:

On 8/21/2023, 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 and #696205118 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.

LocationOverall Good: ☐**Signs/Marker:**

Type	CONTAINERS		
Comment:	Tanks on west end of the Location labeled per 605 Rules		
Corrective Action:		Date:	

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.

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		
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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 ConstructionLocation ID: 479215 CDP: Comment: Corrective Action: Date: **Form 2A COAs:**

Comment: Location remains out of compliance with the Location's Form 2A permit conditions of approval and SWMP.

Corrective Action: Date: **Wildlife BMPs:****Comment:** Corrective Action: Date: **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
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Vehicle Tracking

Comments: Erosion BMPs: Tracking controls, such as a tracking pad at the location entrance(s), to minimize offsite sediment transport not observed on Location.

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.

Other BMPs:

Corrective Action:

Date:

BERMS

Yes

Comments: Erosion BMPs: Perimeter of the working pad.

Other BMPs:

Corrective Action:

Date:

Yes

Material Handling And Spill Prevention

Yes

Comments: Erosion BMPs: Four(4) porta-johns. Staked down/secured to prevent spill.

Other BMPs:

Corrective Action:

Date:

WADDLES

Yes

Comments: Erosion BMPs: 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

It was observed in this inspection that sections of erosion logs on the Location remain improperly installed.

CA will remain applicable until addressed in its entirety.

Other BMPs:

Corrective Action: Comply with Rule 1002.f and install or maintain required BMPs in accordance with good engineering practices.

Date: 07/20/202

3

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:

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

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 _____ Fail _____

Comment _____

Previous inspection observed BMPs to stabilize and maintain segregation at the excavation on the south side of the Location were inadequate. It was observed in this inspection that Operator has backfilled the excavation, however Operator failed to adequately segregate and protect the topsoil horizon, or replace horizons back to their original relative position; topsoil observed mixed with subsoils.

BMPs remain inadequate. See "1002.c" below.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

Previous inspections observed that control measures to stabilize, minimize erosion, degradation and sediment transport remain missing or insufficient at the topsoil stockpile adjacent to the southern Location entrance. Inspection required Operator to comply with Rule 1002.c and 1002.f.

It was observed in this inspection that control measures at the topsoil stockpile remain missing or insufficient. CA remains applicable.

It was also observed that hydromulch is in disrepair on areas of the topsoil stockpiles along the perimeter; controls to protect/stabilize stockpiles required to be installed or maintained per 1002.c.

Corrective Action _____

Comply with Rule 1002.c and 1002.f

Date **06/28/2023**

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 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 <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENT</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>Previous inspection observed 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. Inspection #696205118 documented that, collectively, the ponds have a combined capacity of ~39,713 cubic feet; ponds inadequate in size based on Operators provided calculations;</p> <p>Previous inspection also 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> <p>Previous inspection required Operator to comply with Form 2A permit conditions and Rule 1002.f.</p> <p>Per this inspection: corrective actions to comply with Form 2A permit conditions have not been taken by the Operator, or have been inadequate; Location appears unchanged since previous inspection.</p>	trujilloam	08/22/2023
<p>Refer to document #696205119 for a more detailed overview, including sUAS documentation, of the compliance issues on Location.</p>	trujilloam	08/22/2023

Attached Documents

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

Document Num	Description	URL
403505564	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6228372
696205179	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6228371

