

**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:

09/18/2023

Submitted Date:

09/26/2023

Document Number:

708200568

**FIELD INSPECTION FORM**
 Loc ID 471039 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**

OGCC Operator Number: 10814

Name of Operator: MDS ENERGY DEVELOPMENT LLC

Address: 409 BUTLER RD SUITE A

City: KITTANNING State: PA Zip: 16201

**Status Summary:**

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

**Findings:**

9 Number of Comments

5 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
SAADEH, RICHARD		richard.saadeh@mdsed.com	
CHAPARRO, SIJI		siji.chaparro@iptwell.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
471039	LOCATION	AC			-	Castor 7-59 10	CI
471064	WELL	DG	11/23/2022	LO	123-50750	CASTOR 7-59 10-3-1	CI
471065	WELL	DG	11/22/2022	LO	123-50751	CASTOR 7-59 10-3-5	CI
471066	WELL	DG	11/24/2022	LO	123-50752	CASTOR 7-59 10-3-8	CI
471069	WELL	DG	11/25/2022	LO	123-50755	CASTOR 7-59 10-3-12	CI

**General Comment:**

This is a follow-up Construction and Stormwater Inspection for Location ID (471039) and Field Inspection Report (doc #708200062).

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Trash was observed throughout the location. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606. Location will remain out of compliance until the corrective action has been resolved.	Date:	09/18/2023
Type	WEEDS		
Comment:	Undesirable vegetation (e.g. russian thistle and kochia) was observed throughout the location. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606. Location will remain out of compliance until the corrective action has been resolved.	Date:	09/18/2023

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 Construction**

Location ID: 471039 CDP: \_\_\_\_\_

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

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

Date: \_\_\_\_\_

**Form 2A COAs:**

**Comment:** Previous Comment: Per Wildlife BMP/COA #12 on the Approved Form 2A (Doc #401906116) "Operator will conduct a survey for Plains Sharp Tail Grouse presence and active leks in the area of the mapped SWH and RSO during the 2020 nesting season. Results of the survey shall be reported to the COGCC via a Form 4 Sundry and to the CPW prior to commencing any construction, drilling, and well completion activities in 2020. Operator shall have a third party conduct one PSTG survey in the spring of 2020". It does not appear the Operator has submitted results from the 2020 PSTG survey, as no document could be found within the location's file.

It appears the Operator has performed the previous corrective action and has submitted the 2020 PSTG survey as required by Wildlife BMP/COA #12 via Form 4 Sundry (doc #403354973).

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

Date: \_\_\_\_\_

**Wildlife BMPs:**

**Comment:** Previous Comment: Per Wildlife BMP/COA #9 on the Approved Form 2A (Doc #401906116) "The operator agrees to install raptor perch deterrents on equipment, fences, cross arms and pole tops in plains sharp-tailed grouse habitat". During this inspection, Staff did not observe any raptor perch deterrents on the perimeter fences.

It appears the Operator has performed the previous corrective action and has installed raptor perch deterrents on the perimeter fencing. Some deterrent devices require maintenance (e.g. screws falling out); continue to implement deterrents on all new equipment.

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

Date: \_\_\_\_\_

**Comment:** \_\_\_\_\_**Corrective Action:** \_\_\_\_\_

Date: \_\_\_\_\_

**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:	<u>471039</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u> Status: <u>AC</u> Insp. Status: <u>CI</u>
Facility ID:	<u>471064</u>	Type:	<u>WELL</u>	API Number: <u>123-50750</u> Status: <u>DG</u> Insp. Status: <u>CI</u>
Facility ID:	<u>471065</u>	Type:	<u>WELL</u>	API Number: <u>123-50751</u> Status: <u>DG</u> Insp. Status: <u>CI</u>
Facility ID:	<u>471066</u>	Type:	<u>WELL</u>	API Number: <u>123-50752</u> Status: <u>DG</u> Insp. Status: <u>CI</u>
Facility ID:	<u>471069</u>	Type:	<u>WELL</u>	API Number: <u>123-50755</u> Status: <u>DG</u> Insp. Status: <u>CI</u>

**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 \_\_\_\_\_ In \_\_\_\_\_

Comment \_\_\_\_\_

This location does not comply with Rule 1002.b. COGCC staff performed calculations of the topsoil stockpile and estimates that there is approximately 5,925 cubic yards of topsoil salvaged and stored on the northern end of the location. This is equivalent to approximately 4" of topsoil removed from the location. The location is almost entirely in one soil unit (54: Platner loam) with an average topsoil depth of 11" (UC Davis SoilWeb); additionally, Staff conducted a soil pit and determined there is approximately 10" of top soil on location. The Operator should have salvaged approximately 14,639 cubic yards of topsoil over a 10.9 acre disturbance area (e.g. size of pad, not including topsoil underneath stockpile) at a depth of at least 10".

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

The Operator submitted Form 4 Sundry (doc #403526439) on 09/11/2023 with an attached "Topsoil Importation Plan". Staff is currently reviewing the topsoil importation plan and awaiting additional information from the Operator as of 09/26/2023. Therefore, this corrective action is being left "In-Process" until the corrective action has been addressed in its entirety.

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

This location does not comply with Rule 1002.c. Previous inspections documented that all stockpiled soils had been seeded and straw crimped for stabilization. During this inspection, Staff observed that the topsoil stockpile and the areas outside of the active drilling operations are predominantly undesirable vegetation (e.g. kochia and russian thistle), with areas of bare and exposed soils also observed.

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

Comply with Rule 1002.c. Location will remain out of compliance until the corrective action Date has been resolved.

Rule 1002.c. states all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Date **09/18/2023**

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 \_\_\_\_\_

Operator shall comply with interim reclamation timing requirements. Refer to "Notice to Operators: Interim Reclamation Procedures for Delayed Operations" found on ECMC website under the following tabs "Regulation" -&gt; "Policies" for additional information.

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 ☐**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Previous Comment: The sediment trap in the northwest corner of the location appears to be inadequate in size and does not seem sufficient enough to capture a stormwater event for the size of the location. Additionally, an animal burrow was observed on the western berm of the aforementioned sediment trap. Refer to attached inspection photos for documentation.

09/18/2023 Comment: It does not appear any work to improve and/or implement more robust stormwater control measures has been performed since the previous inspection. The NW corner sediment trap remains inadequate in size. Refer to attached inspection photos.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C. Corrective action date is being back-dated to when the location was first observed out of compliance.

Date: 03/15/2023

Pits: ☐ 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
708200569	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6265027">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6265027</a>