

**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:

10/20/2023

Submitted Date:

10/24/2023

Document Number:

708200643

FIELD INSPECTION FORMLoc ID 465272 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10774

Name of Operator: SUMMIT OIL & GAS LLC

Address: PO BOX 983038

City: PARK CITY State: UT Zip: 84098

Status Summary:

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

Findings:

12 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
PITTSLEY, BENJAMIN		bp@s-companies.com	
DULLACK, BRENT		bd@s-companies.com	
BRADLEY, SAM		sb@s-companies.com	Principal Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465267	WELL	AP	06/29/2021	LO	123-50197	Castor 7-59 12-1-10	RI
465268	WELL	AP	06/29/2021	LO	123-50198	Castor 7-59 12-1-7	RI
465270	WELL	AP	06/29/2021	LO	123-50200	Castor 7-59 12-1-9	RI
465271	WELL	PR	10/01/2022	OW	123-50201	Castor 7-59 12-1-3	RI
465272	LOCATION	AC			-	Castor 7-59 12	RI
465273	WELL	PR	08/01/2022	OW	123-50202	Castor 7-59 12-1-1	RI
465275	WELL	AP	06/29/2021	LO	123-50204	Castor 7-59 12-1-8	RI
465276	WELL	PR	10/24/2022	OW	123-50205	Castor 7-59 12-1-5	RI
465277	WELL	AP	06/29/2021	LO	123-50206	Castor 7-59 12-1-11	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection to previous Field Inspection Reports (Doc #697503330, #697503871, #697504471, and #708200533). This is also in response to FIRR (doc #403531198 and #403554306).

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	TRASH		
Comment:	Trash observed throughout the location. Refer to inspection photos.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	10/20/2023
Type	WEEDS		
Comment:	It appears that undesirable weedy vegetation (e.g. kochia and russian thistle) previously observed throughout the location has been mechanically managed. The Operator also indicated on FIRR (doc #403531198) that the location has been sprayed for weed control. Previous corrective action has been resolved; the Operator shall continue weed management on the location at all times.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Stained soil was observed around tank battery area and buckets with apparent hydrocarbons observed outside of containment. Refer to attached inspection photos for documentation.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. The location will remain out of compliance until the corrective action has been resolved.	Date:	10/20/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:	During this inspection, Staff observed that load out lines were hung over secondary containment and that load out lines did have bull plugs installed. Operator should consider placing the entirety of the load out lines within secondary containment in the event that a bull plug or valve failure occurs.		
Corrective Action:		Date:	

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>465267</u>	Type:	<u>WELL</u>	API Number:	<u>123-50197</u>	Status:	<u>AP</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465268</u>	Type:	<u>WELL</u>	API Number:	<u>123-50198</u>	Status:	<u>AP</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465270</u>	Type:	<u>WELL</u>	API Number:	<u>123-50200</u>	Status:	<u>AP</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465271</u>	Type:	<u>WELL</u>	API Number:	<u>123-50201</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465272</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465273</u>	Type:	<u>WELL</u>	API Number:	<u>123-50202</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465275</u>	Type:	<u>WELL</u>	API Number:	<u>123-50204</u>	Status:	<u>AP</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465276</u>	Type:	<u>WELL</u>	API Number:	<u>123-50205</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>465277</u>	Type:	<u>WELL</u>	API Number:	<u>123-50206</u>	Status:	<u>AP</u>	Insp. Status:	<u>RI</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 Pass

Comment

Previous FIR (Doc #697504471) required the Operator to import approximately 6300 cubic yards of topsoil by no later than May 1, 2023, and FIR (Doc #708200533) further required the Operator to submit a topsoil and interim reclamation plan after importation activities occurred. Operator submitted FIRR (Doc #403554306) with attachment (Doc #403554338) detailing the topsoil importation and interim reclamation activities. The plan reports that approximately 7150 cubic yards was imported, with 5850 cubic yards redistributed throughout the interim areas and an additional 1300 cubic yards stockpiled on the NW portion of the production areas. This corrective action has been resolved based on field observations and Operator submitted documentation.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS Fail

Comment

Previous FIR (doc #708200533) documented undesirable vegetation within the topsoil stockpile and required mitigation to protect soils. During this inspection, Staff observed that the weedy vegetation had been managed (e.g. mowed), however, subsequent reseeding/mulching had not occurred. While the Operator indicated on FIRR (doc #403531198) that a contractor was hired to reseed the location, no apparent reclamation work was observed at this time. All bare/exposed soils shall be protected from wind and water erosion degradation immediately. Additionally, Operator shall restrict all vehicle traffic on stockpiles.

Corrective Action

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

Date 10/20/20231002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment

This location does not comply with Rule 1002.e. During this inspection, Staff observed that the production areas and cut slopes around the perimeter of the location do not appear to be properly stabilized as bare/exposed soils and wind erosion (e.g. blow sand in stormwater ditches) were apparent. Additional stabilization activities are required to protect soils from further wind and water erosion degradation. Refer to attached inspection photos.

Corrective Action

Comply with Rule 1002.e. The location will remain out of compliance until the corrective action has been resolved.

Date 10/20/2023

1003a. Waste and Debris removed? _____

Comment

Refer to "Good Housekeeping" section comments.

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? Pass

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? Pass

Comment

Corrective Action

Date

Guy line anchors marked? _____

Comment

Corrective Action

Date

1003b. Area no longer in use? InProduction areas stabilized ? Fail

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

At the time of this inspection, it appears the Operator is in the process of performing interim reclamation activities with evidence of production areas being reduced in size and the importation of approximately 7150 cubic yards of topsoil that was redistributed throughout the interim areas, as required by previous corrective actions. The Operator indicated on FIRR (doc #403531198) that a contractor was hired to reseed the location at a later date. An inspection will be performed at a future date to ensure compliance with Rule 1003, therefore, this location is being left "In-Process". It is ECMC's expectation that continued interim reclamation activities are performed ASAP.

Corrective Action

Date

Overall Interim Reclamation In Process**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: During this inspection, Staff observed that erosion degradation repairs have been performed (also indicated by the Operator in FIRR doc #403531198). A sediment basin within the northeast corner of the location was constructed, however, portions of the berm were left unconsolidated which can become a source of sedimentation/pollution itself. Inlet/outlet protections are temporary (e.g. straw wattles) and more permanent controls should be considered for long term. Production areas/cut slopes are also unstabilized and stormwater ditches are beginning to fill with blow sand (see also Section 1002.e). Refer to attached inspection photos for documentation.

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective action date is the date the location was observed out of compliance, as the location should be in compliance at all times.

Date: 10/20/2023

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
708200644	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6296796