

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

11/14/2023

Submitted Date:

11/16/2023

Document Number:

696205419

## FIELD INSPECTION FORM

 Loc ID: 485124  
 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

**Operator Information:**
 OGCC Operator Number: 10456  
 Name of Operator: CAERUS PICEANCE LLC  
 Address: 1001 17TH STREET #1600  
 City: DENVER State: CO Zip: 80202
**Findings:**

- 12 Number of Comments
- 2 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	
,		COGCC.inspections@caerus oilandgas.com	All Inspections
Roberts, James		j75rober@blm.gov	Rio Blanco, Moffat

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
485123	LOCATION	AC			-	PCU FED A27-197 CDP	CI
485124	LOCATION	AC	09/18/2023		-	PCU FED B27-197	CI

**General Comment:**

On 11/14/2023, Reclamation Specialist Trujillo conducted a stormwater and construction inspection for access roads leading to Caerus Piceance LLC's PCU Fed B27-197 and A27-197 CDP locations in Rio Blanco County, Colorado.

At time of inspection, no OGD or Form 2A Location permits have been approved for the Locations; Pursuant to Commission Order 1-328, Operator was granted a variance from Rules 303, 304, 306 and 307 to construct the access roads prior in advance of the OGD being heard or approved.

It was observed that construction activities were in process. Dry and windy conditions existed at time of inspection.

The following compliance issues were observed during this inspection:

- Fugitive dust.
- BMP maintenance

Refer to the "Construction" section of this inspection report for additional details.

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:

**Signs/Marker:**

Type	OTHER		
Comment:	OGDG and Form 2As have not been approved, therefore permit information is unavailable to comport with Rule 406.d.  Two Form 4 sundries (#403557567, #403557404) related to a variance permitting the construction of the access roads are currently "in process"; Upon approval, the Form 4s and documents attached will require posting until the OGDG and Location Permits have been approved; at which point a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will also be required.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Signage for the two Locations have been posted at the entrance of the access road pursuant to 406.d.		
Corrective Action:		Date:	

**Emergency Contact Number:**

Comment:

Corrective Action:

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

Overall Good:

**Spills:**

Type	Area	Volume		

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: 485124

CDP: \_\_\_\_\_

Comment:

Due to safety reasons related to construction activities, Reclamation Specialist was unable to access the total length of the disturbance for both the access road within the drainage, and on top of the ridge. A followup inspection will be performed at a later date.

Corrective Action:

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

**Form 2A COAs:**

Comment:

2As for the two Locations have not yet been approved.

Corrective Action:

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

**Wildlife BMPs:**

**Comment:**

Corrective Action:

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

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present

Comments: Erosion BMPs: Access road construction in process. Fill slopes along road will require stabilization measures upon completion.

Other BMPs: Fugitive dust control measures required.

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

	Yes		
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Comments: Erosion BMPs: Erosion logs (straw wattles) implemented on both sides of the access road during construction activities. There are areas where soils have been pushed over the control measure. Maintenance required.

Other BMPs:

Corrective Action: Comply with Rule 1002.f; install or repair required stormwater and erosion control measures in accordance with good engineering practices. **Date:** 11/14/2023

	No		
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Comments: Erosion BMPs: Fugitive dust issues observed during construction activities. Soils observed along the roads were very loose and powdery. BMPs and active measures, such as application of fresh water, were not observed during dry and windy conditions, as indicated by Operator's "Dust Mitigation Plan".

Other BMPs:

Corrective Action: Comply with Rule 1002.f: Implement and maintain fugitive dust control measures. **Date:** 11/14/2023

**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: 485123 Type: LOCATION API Number: - Status: AC Insp. Status: CI

Facility ID: 485124 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: \_\_\_\_\_

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

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_ In \_\_\_\_\_

Comment Topsoil pit conducted within the drainage area of the access road. Very little change in color from surface to 15" BLG; roots observed were more dense/abundant within 0-6 inches. Soilweb states soils within the drainage areas of the road are a "Barcus channery Loam Sand", with an "A" horizon from 0-6 inches, and C horizons from 6-60 inches; this is consistent with observations made within the field. Soils within the C horizon are also noted to be "very friable".

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

Date \_\_\_\_\_

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

Comment Soils observed are loose and at risk to wind erosion; fugitive dust observed. See "Stormwater" under the "Location Construction" section of this report.

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

Date \_\_\_\_\_

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 \_\_\_\_\_

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

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

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

**Attached Documents**

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

Document Num	Description	URL
696205420	Example of Fugitive Dust issues Observed	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6326043">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6326043</a>
696205421	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6326046">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6326046</a>