

**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:

12/18/2023

Submitted Date:

12/19/2023

Document Number:

696205471

FIELD INSPECTION FORMLoc ID 484545 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 3104

Name of Operator: ANSCHUTZ EXPLORATION CORP

Address: 555 17TH ST STE 2400

City: DENVER State: CO Zip: 80202

Status Summary:

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

Findings:

13 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
Organ, Lindsey		lindsey.organ@aec-denver.com	Principal Agent
Noto, John		john.noto@state.co.us	
Andrews, Doug		doug.andrews@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
484545	LOCATION	AC			-	Coyote Fed 0397-14	CI
484991	WELL	AP	08/28/2023		081-07846	Coyote Fed 0397-14-3-1NH	CI
484992	WELL	AP	08/28/2023		081-07847	Coyote Fed 0397-14-2-4NH	CI
484993	WELL	AP	08/28/2023		081-07848	Coyote Fed 0397-14-2-3WNH	CI
484994	WELL	AP	08/28/2023		081-07849	Coyote Fed 0397-14-2-3NH	CI
484995	WELL	AP	08/28/2023		081-07850	Coyote Fed 0397-14-23-13NH	CI
484996	WELL	AP	08/28/2023		081-07851	Coyote Fed 0397-14-23-14NH	CI

General Comment:

On 12/18/2023, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction inspection at Anschutz Exploration Corp's Coyote Fed 0397-14 location in Moffat County, Colorado.

Location is Fee Surface, with Fed Minerals.

Location is within the following High Priority Habitats:

- Aquatic Sportfish Management Waters
- Greater Sage Grouse Priority Habitat Management Area
- Elk Severe Winter Range
- Elk Winter Concentration Area
- Mule Deer Winter Concentration Area
- Pronghorn Winter Concentration

It was observed that the initial Location construction activities have been complete; the Location's disturbance area has been defined; Operator was observed importing base material to finish grading and stabilizing the working pad surface. Topsoil salvage completed - Excavator observed regrading the topsoil stockpiles to a 5:1 slope.

The following compliance issues were observed during this inspection:

- Form 2A Permit Condition Requirements / §34-60-121(1) CRS Statute
- Stormwater
- Permit Posting Requirements
- Signage requirements

Refer to the "Location Construction" and "Reclamation" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

It is ECMC's expectation that Operators are in compliance with ECMC rules at all times; any corrective action(s) from previous inspections that have not been addressed are still applicable.

Consequently, dates for any corrective actions provided will either 1) be back-dated to when the Operator should have been in compliance, or 2) be the date of the inspection for which the Location was observed out of compliance (the "Date of Discovery"). Unless specifically directed within this Inspection Report, the CA date is not the date ECMC expects the Operator to have taken corrective actions.

The 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	OTHER		
Comment:	<p>A copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim Reclamation.</p> <p>The Form 2A and any Form 4 modifying the approved Form 2A was not observed posted on the Location.</p>		
Corrective Action:	<p>Comply with Rule 406.c.</p> <p>A CA Date of 11/16/2023 is being provided, as this is the "Start Date" for construction of the Location, per Form 42 #403597299, and when Permit information was required to be posted.</p>	Date:	11/15/2023
Type	OTHER		
Comment:	<p>Pursuant to the Form 2A permitted Topsoil Protection Plan (document no. 403221734), topsoil will be marked and clearly identified.</p> <p>Topsoil stockpiles not marked at time of inspection. Contour work "in process".</p>		
Corrective Action:		Date:	
Type	OTHER		
Comment:	<p>For new Oil and Gas Locations, from the time of construction until Reclamation is complete, the Operator will post a sign at the entrance to an Oil and Gas Location that includes the: (1) Oil and Gas Location name; (2) Commission's assigned Oil and Gas Location identification number (ID #); (3) The Operator's telephone number where it may be reached at all times; and (4) Telephone number(s) for local emergency services (911 where available).</p> <p>Signage not posted at Location entrance.</p>		
Corrective Action:	<p>Comply with Rule 605.a.</p> <p>A CA Date of 11/16/2023 is being provided, as this is the "Start Date" for construction of the Location, per Form 42 #403597299, and when signage was required.</p>	Date:	11/16/2023
Type	OTHER		
Comment:	<p>The Operator will, concurrent with the Rule 412 Surface Owner notice, post a sign not less than 2 feet by 2 feet at the intersection of the lease road and the public road providing access to the Oil and Gas Location, with the name of the proposed Well or Oil and Gas Location, the legal location thereof, and the estimated date of commencement of construction. Such sign will be maintained until Well completion operations and construction operations at the Oil and Gas Location are concluded.</p> <p>Signage not observed at intersection of lease road and public road.</p>		
Corrective Action:	<p>Comply with Rule 406.d.</p> <p>A CA Date of 11/16/2023 is being provided, as this is the "Start Date" for construction of the Location, per Form 42 #403597299, and when signage was required.</p>	Date:	11/16/2023

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: 484545

CDP: Comment: Corrective Action: Date: **Form 2A COAs:****Comment:** Corrective Action: Date: **Wildlife BMPs:****Comment:** Corrective Action: Date: **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
BERMS	No		
Comments: Erosion BMPs:	<input type="text"/>		
Other BMPs:	<input type="text"/>		
Corrective Action:			Date: <input type="text"/>
		Vehicle Tracking	No
Comments: Erosion BMPs:	<input type="text"/>		
Other BMPs:	<input type="text"/>		
Corrective Action:			Date: <input type="text"/>
	No		
Comments: Erosion BMPs:	<input type="text"/>		
Other BMPs:	<input type="text"/>		
Corrective Action:			Date: <input type="text"/>

DITCHES	No		
Comments: Erosion BMPs: <input type="text"/> Other BMPs: <input type="text"/> Corrective Action: _____ Date: _____			
WADDLES	No		
Comments: Erosion BMPs: <input type="text"/> Other BMPs: <input type="text"/> Corrective Action: _____ Date: _____			

Comment:

Corrective Action: **Date:** 11/16/2023

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:	<u>484545</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u> Status: <u>AC</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484991</u>	Type:	<u>WELL</u>	API Number: <u>081-07846</u> Status: <u>AP</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484992</u>	Type:	<u>WELL</u>	API Number: <u>081-07847</u> Status: <u>AP</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484993</u>	Type:	<u>WELL</u>	API Number: <u>081-07848</u> Status: <u>AP</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484994</u>	Type:	<u>WELL</u>	API Number: <u>081-07849</u> Status: <u>AP</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484995</u>	Type:	<u>WELL</u>	API Number: <u>081-07850</u> Status: <u>AP</u> Insp. Status: <u>CI</u>
Facility ID:	<u>484996</u>	Type:	<u>WELL</u>	API Number: <u>081-07851</u> Status: <u>AP</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 _____

Comment _____

Pursuant to the Form 2A permitted Topsoil Protection Plan (document no. 403221734), a minimum of 6 inches of topsoil will be salvaged, resulting in ~4,050 cubic yards of topsoil being salvaged and stored along the southern and eastern ends of the Location.

It was observed in this inspection that topsoil salvage activities have been completed; Operator was observed re-contouring the stockpiles to achieve 5:1 slopes.

Currently, No BMPs have been implemented at the topsoil stockpiles to ensure segregation. Refer to "Stormwater" and "1002.c".

A follow-up inspection will be conducted to verify topsoil amount salvaged.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

Pursuant to Operator's Form 2A #403128374 condition requirements, wattles will be placed around the entire perimeter of the topsoil stockpile to minimize potential for loss of organic materials.

At time of inspection, BMPs to manage stormwater along the perimeter of the Location, including the topsoil stockpiles, have not been installed on the Location (See stormwater comments); BMPs to protect the topsoil stockpiles and to minimize sediment transport and ensure soils remain segregated are missing or insufficient.

Corrective Action _____

Comply with Form 2A #403128374 permit Condition requirements, and Rule 1002.f and Rule 1002 little b and little c. A CA Date of 11/16/2023 is being provided, as this is the "Start Date" for construction of the Location, per Form 42 #403597299, and when perimeter stormwater and erosion control BMPs were required.

Date **11/16/2023**

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: Per the Form 2A, drilling fluids and cuttings will be disposed offsite. _____

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 ☐Multi-Well Location ☐**COGCC Comments**

Comment	User	Date
<p>Topsoil Stockpile-</p> <p>At time of inspection, Operator was observed contouring the topsoil stockpile to a 5:1 slope.</p> <p>Pursuant to the Form 2A Topsoil Protection Plan, salvaged topsoil will be seeded... during drilling and well completions operations.</p> <p>-Seeding activities advised upon completion of construction, and prior to drilling operations.</p> <p>If seeding activities are to be delayed until drilling commences, temporary BMPs to stabilize the topsoil stockpiles (e.g. mulch, tackifier, erosion blankets, etc...) will required upon completion of topsoil contouring work currently occurring. Upon seeding, additional measures (such as those listed above) will be required to stabilize the seeded soils as well as to protect the stockpiles from weed establishment.</p>	trujilloam	12/19/2023

<p>STORMWATER COMMENTS</p> <p>Pursuant to conditions on Operator's Form 2A #403128374 condition requirements:</p> <ul style="list-style-type: none"> -Stormwater control measures will be in place during all phases of development to control stormwater runoff in a manner that minimizes erosion, transportation of sediment off site, and site degradation. - Installation of stormwater control measures will be installed based on the attached Construction Layout Erosion Control Plan and Access Road Plan & Profiled Erosion Control Plan. -Stormwater control measures will include perimeter controls such as sediment traps, diversion ditches, check dams, wattles (sediment control logs), and other control measures necessary to control stormwater run-on and run-off and minimize offsite movement of sediment. Control measures will also include site degradation control measure such as grading, slope stabilization methods (i.e., seeding, mulching, surface roughening), perimeter berms, surfacing materials (i.e., gravel, and other necessary controls to minimize site degradation. <p>It was observed in this inspection that the Location is out of compliance with the Location's Form 2A permit Conditions, and ECMC Stormwater Rules:</p> <ul style="list-style-type: none"> - Pursuant to the Form 2A Construction permitted Layout Drawing (document no. 2222109), a stormwater diversion ditch ("v ditch") will be constructed along the Location's perimeter. <p>No stormwater and erosion control BMPs, including the stormwater diversion ditch, have been implemented along the Location's perimeter.</p> <ul style="list-style-type: none"> - Pursuant to the Form 2A permitted Construction Layout Drawing (document no. 2222109), two "water settlement traps" will be implemented along the southern perimeter of the Location, and a third along the northwestern corner. <p>Sediment traps have not been implemented on the Location. Pursuant to good engineering practices, sediment traps will be constructed with engineered inlet/outlet protections; rip-rap material (if implemented as armoring) will be used in conjunction with geotextile lining.</p> <ul style="list-style-type: none"> -Pursuant to the Form 2A permitted SWMP (document no. 403271169), prior to commencement of earth moving activities, temporary BMPs will be installed around the proposed perimeter of the site. Stormwater control measures, such as sediment traps and diversion ditches, will then be installed along the perimeter of the site prior to pad excavation. <p>Neither temporary nor long term BMPs have been installed on the Location, including the Location's perimeter; BMPs were required prior to commencement of construction.</p> <p>Fill slopes currently bare and unstabilized. Slopes of the Location will require stabilization control measures.</p> <p>Stormwater and erosion control BMPs to manage runoff in a manner that minimizes erosion, degradation and sediment transport have not been installed on the Location; violating the Location's Form 2A permit conditions, and Rule 1002.f.</p> <p>It is also noted that the Location has been constructed in such a manner where fill material has been placed into drainages of "Rimrock Gulch", an intermittent stream and designated Aquatic Sportfish Management Waters. BMPs to minimize sediment discharge into Rimrock Gulch have not been implemented.</p>	trujilloam	12/19/2023
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Attached Documents

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

Document Num	Description	URL
696205472	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6362003