

**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:

03/12/2024

Submitted Date:

03/13/2024

Document Number:

696205674

**FIELD INSPECTION FORM**Loc 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:**

23 Number of Comments

3 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
		lindsey.organa@aec-denver.com	

**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	ND
484992	WELL	AP	08/28/2023		081-07847	Coyote Fed 0397-14-2-4NH	ND
484993	WELL	AP	08/28/2023		081-07848	Coyote Fed 0397-14-2-3WNH	ND
484994	WELL	AP	08/28/2023		081-07849	Coyote Fed 0397-14-2-3NH	ND
484995	WELL	AP	08/28/2023		081-07850	Coyote Fed 0397-14-23-13NH	ND
484996	WELL	AP	08/28/2023		081-07851	Coyote Fed 0397-14-23-14NH	ND

**General Comment:**

On 3/12/2024, 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

This is a follow-up inspection to #696205471, to document compliance for the following corrective actions:

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

This inspection is also in response to Resolution #403664415 stating corrective actions have been completed.

It was observed in this inspection that the corrective actions regarding lease road signage, and permit posting requirements have been resolved; all other corrective actions have not been adequately addressed and remain outstanding.

Anschutz Exploration Corp representatives were on site at time of inspection, and was provided notice regarding the compliance issues.

Refer to the "Location" and "Reclamation" sections 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 inspection that have not been addressed are still applicable.

**Location**Overall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	<p>Inspection #696205471 observed that signage at the Location entrance had not been posted. Inspection required Operator to comply with Rule 605.a.</p> <p>It was observed in this inspection that signage with information for the permitted wells, Operator emergency contact information, as well as other general safety information has been posted at the Location entrance; however the Oil and Gas Location name and Commission's assigned Oil and Gas Location identification number (ID #) has not been posted pursuant to Rule 605.a.(1) and 605.a.(2).</p> <p>This CA has not been addressed in its entirety; corrective action per Inspection #696205471 and remains applicable.</p>		
Corrective Action:	Corrective action per Inspection #696205471: Comply with Rule 605.a	Date:	01/01/1111
Type	OTHER		
Comment:	<p>Inspection #696205471 observed that signage along the intersection of the lease road and public road had not been posted. Inspection required Operator to comply with Rule 406.d</p> <p>It was observed in this inspection that signage has been posted at the road. This corrective action has been resolved.</p>		
Corrective Action:		Date:	
Type	OTHER		
Comment:	<p>Inspection #696205471 observed that a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A had not been posted on the Location. Inspection required Operator to comply with Rule 406.c.</p> <p>It was observed in this inspection that the Location permit has been posted at the Location entrance. This Corrective Action has been resolved.</p>		
Corrective Action:		Date:	
Type	OTHER		
Comment:	<p>Pursuant to the Form 2A permitted Topsoil Protection Plan (document no.403221734), topsoil stockpile along the north and east end of the Location has been marked and clearly identified.</p>		
Corrective Action:		Date:	

**Emergency Contact Number:**

Comment: 1-888-696-1300 / 911

Corrective Action:

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

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: 484545 CDP: \_\_\_\_\_

Comment: Pursuant to Form 2A #403128374, the total permitted disturbed area during construction of the Location is 6.82 acres. With use of a sUAS, it is calculated that the fenced disturbance areas is ~6.8 acres. Location is within the Form 2A permitted disturbance area.

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

**Form 2A COAs:**Comment: \_\_\_\_\_

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

**Wildlife BMPs:**Comment: \_\_\_\_\_

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

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
Comments: Erosion BMPs:	Slope Drains x 3. Inadequate inlet protections.		
Other BMPs:			
Corrective Action:			Date:
Comments: Erosion BMPs:	Straw bale velocity check dams		
Other BMPs:			
Corrective Action:			Date:
		Vehicle Trakcing	
Comments: Erosion BMPs:	Missing, insufficient and/or not installed or maintained per good engineering practices.		
Other BMPs:			
Corrective Action:			Date:
DITCHES			
Comments: Erosion BMPs:	Missing, insufficient and/or not installed or maintained per good engineering practices.		
Other BMPs:			
Corrective Action:			Date:

BERMS

Comments: Erosion BMPs: Missing, insufficient and/or not installed or maintained per good engineering practices.

Other BMPs:

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

Comments: Erosion BMPs: Sediment traps in conjunction with slope drains x 3. Outlets armored with rip-rap material in conjunction with geotextile lining per good engineering practice.

Basins of trap and inlet protections inadequate.

Other BMPs:

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

Comments: Erosion BMPs: Topsoil protections- Missing, insufficient and/or not installed or maintained per good engineering practices.

Other BMPs:

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

Comments: Erosion BMPs: Multi-angular and sized riprap material in conjunction with geotextile lining.

Other BMPs:

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

Comments: Erosion BMPs: Stormwater controls @ perimeter of disturbance- Missing, insufficient and/or not installed or maintained per good engineering practices.

Other BMPs:

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

Comments: Erosion BMPs: BMPs @ Slopes- Missing, insufficient and/or not installed or maintained per good engineering practices.

Other BMPs:

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

WADDLES

Comments: Erosion BMPs: Missing, insufficient and/or not installed or maintained per good engineering practices.

Other BMPs:

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

**Comment:** Refer to "STORMWATER COMMENTS" at the end of this report.**Corrective Action:** Corrective action per inspection #696205471: Comply with Form 2A #403128374 permit Condition requirements, and Rule 1002.f**Date:** \_\_\_\_\_**On Site Inspection (305):**Surface Owner Contact Information:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Inspector Name: Trujillo, Aaron

Phone Number: _____	Cell Phone: _____	
<u>Operator Rep. Contact Information:</u>		
Landman Name: _____	Phone Number: _____	
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____	
Request LGD Attendance: _____		
<u>LGD Contact Information:</u>		
Name: _____	Phone Number: _____	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>		
<div></div>		
<u>Summary of Operator Response to Landowner Issues:</u>		
<div></div>		
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>		
<div></div>		

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>ND</u>
Facility ID:	<u>484992</u>	Type:	<u>WELL</u>	API Number: <u>081-07847</u> Status: <u>AP</u> Insp. Status: <u>ND</u>
Facility ID:	<u>484993</u>	Type:	<u>WELL</u>	API Number: <u>081-07848</u> Status: <u>AP</u> Insp. Status: <u>ND</u>
Facility ID:	<u>484994</u>	Type:	<u>WELL</u>	API Number: <u>081-07849</u> Status: <u>AP</u> Insp. Status: <u>ND</u>
Facility ID:	<u>484995</u>	Type:	<u>WELL</u>	API Number: <u>081-07850</u> Status: <u>AP</u> Insp. Status: <u>ND</u>
Facility ID:	<u>484996</u>	Type:	<u>WELL</u>	API Number: <u>081-07851</u> Status: <u>AP</u> Insp. Status: <u>ND</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 \_\_\_\_\_ Fail \_\_\_\_\_

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. With use of a sUAS, it was calculated that approximately 5,615 cubic yards of topsoil has been salvaged and stored.

It was observed in this inspection that BMPs to protect the topsoil stockpile, as well as to ensure soils remain properly segregated are missing or insufficient. See "Stormwater Comments" at the end of this report and "1002.c"

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

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

Refer to the "Topsoil Protections" under "COGCC Comments" at the end of this report.

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

Corrective action per inspection #696205471: Comply with Form 2A #403128374 permit Condition requirements, and Rule 1002.f and Rule 1002 little b and little c.

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: 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><b>TOPSOIL PROTECTIONS</b></p> <p>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; Stormwater control measures will also include site degradation control measure such as slope stabilization methods (i.e., seeding, mulching, surface roughening).</p> <p>Inspection #696205471 observed that BMPs to protect the topsoil stockpiles and to minimize sediment transport and ensure soils remain segregated are missing or insufficient. Inspection required Operator to comply with Form 2A #403128374 permit Condition requirements, and Rule 1002.f, and Rule 1002 little b and little c.</p> <p>Inspection #696205471 also stated that, 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. 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> <p>It was observed in this inspection that BMPs to protect the topsoil stockpile, as well as to minimize erosion, degradation and sediment transport remain missing or insufficient.</p> <p>-Topsoil is currently bare. Erosion, degradation and sediment transport observed at the stockpile; topsoil stockpile lacks stabilization and adequate stormwater protections.</p> <p>-Erosion logs implemented along the perimeter of the topsoil stockpile have not been installed in accordance with good engineering practices; BMP has not been properly trenched and staked; BMPs to minimize sediment transport remain missing or insufficient.</p> <p>-Stormwater diversion ditch along the pad perimeter has been constructed into the toe of the Topsoil stockpile; this is not per good engineering practice to ensure stockpile remains properly segregated, and can lead to stormwater impacts to the stockpile, as well as mixing of sediment with the topsoil resource; topsoil sediment transport due to degradation at the stockpile has resulted in topsoil deposition into the stormwater diversion ditch.</p> <p>Corrective action per Inspection #696205471 has not been addressed and remains applicable.</p>	trujilloam	03/13/2024
<p><b>STORMWATER COMMENTS</b></p> <p>Pursuant to conditions on Operator's Form 2A #403128374 condition requirements: 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 &amp; 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 measures 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> <p>Inspection #696205471 observed that the Location is out of compliance with the Location's Form 2A permit Conditions, and ECMC Stormwater Rules:</p> <p>- 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. No stormwater and erosion control BMPs, including the stormwater diversion ditch, have been implemented along the Location's perimeter.</p> <p>-Pursuant to the Form 2A permitted Construction Layout Drawing (document no. 2222109),</p>	trujilloam	03/13/2024

two "water settlement traps" will be implemented along the southern perimeter of the Location, and a third along the northwestern corner. Sediment traps have not been implemented on the Location.

-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. 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.

-Fill slopes bare and unstabilized. Slopes of the Location will require stabilization control measures. 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.

Inspection #696205471 required Operator to comply with Form 2A #403128374 permit Condition requirements, and Rule 1002.f.

It was observed in this inspection that work to address the compliance issues and Form 2A permit condition requirements has been insufficient:

-Three sediment traps have been constructed on the Location; two along the southern perimeter of the pad; one along the northwest corner of pad. BMP has been implemented in conjunction with slope drains leading to rip-rap armored outlets. Outlets appear adequate however sediment traps and slope drains lack properly engineered basins, and inlet protections at the pipe connected to the slope drain.

-Operator has installed a berm along the southern and western perimeter of the working pad surface; BMP has not been installed per good engineering practice and lacks proper consolidation.

-Slopes (fill slopes and the soil stockpiles) lack stabilization; BMPs to minimize erosion, degradation and sediment transport remain missing or insufficient.

-BMPs along the perimeter of the Location to minimize erosion, degradation and sediment transport also remain missing or insufficient. Sediment transport along the southern and western areas of the Location observed.

-A Stormwater diversion ditch has been constructed along the northern and eastern perimeter of the working pad surface, as well as along the northern and eastern perimeter of the topsoil stockpile. Areas of the diversion ditch have not been properly consolidated; sediment has been pushed onto sections of ditch on the northwest end of the pad. Ditch has also been constructed into the toe of the topsoil stockpile (See "Topsoil Protections" comment). Ditch along the northern/eastern perimeter of the stockpile has been constructed with vertical slopes rather than an appropriate "v-ditch" per the Operator's SWMP. Outlet at the ditch on the southeast end of the Location leading off-site is inadequate, resulting in erosion degradation within the control. Operator also appears to have implemented a ditch along the western perimeter of the Location, at the base of the fill slopes; BMP also has not been installed per good engineering practice.

-Erosion logs at toe of topsoil stockpile not per good engineering practice (See "Topsoil Protections" comment).

-Southern areas of the working pad surface lack stabilization; tracking/degradation issues observed.

This Location remains out of compliance with with Form 2A #403128374 permit requirements, Rule 1002.f and corrective action requirements per inspection #696205471; Corrective action per inspection #696205471 remains applicable.

#### **Attached Documents**

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

Document Num	Description	URL
696205675	Inspection Photos, Annotation and Issue Report	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6465102">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6465102</a>