



On 3/12/2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Anschutz Exploration Corp's BHR O23-397 location in Rio Blanco 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 also a follow-up inspection to #696205478, to document compliance for the following corrective actions:

- Interim Reclamation of areas not needed for production
- Good Housekeeping (Trash, debris, unused equipment).
- Loadlines lack cap/plug
- Wildlife Protections
- Spills
- Weeds

This inspection is also in response to Resolution #403659934 stating corrective actions have been completed.

It was observed in this inspection that the corrective actions regarding wildlife protections, and some good housekeeping items have been resolved.

Corrective actions regarding loadlines, trash/debris/unused equipment (good housekeeping), fluids within containment and interim reclamation have not been addressed and remain outstanding.

The following new compliance issues were observed per this inspection:

- Stormwater
- Spills/Impacted soils

Refer to the "Location", "Reclamation" and "Stormwater" 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:           | Location |       |  |
| Corrective Action: |          | Date: |  |
| Type               | WELLHEAD |       |  |
| Comment:           |          |       |  |
| Corrective Action: |          | Date: |  |
| Type               | BATTERY  |       |  |
| Comment:           |          |       |  |
| Corrective Action: |          | Date: |  |

**Emergency Contact Number:**

Comment: 1-888-696-1300

Corrective Action:

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

**Good Housekeeping:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               | TRASH  |       |  |
| Comment:           | <p>Inspection #696205478 observed various trash/debris/rubbish/etc... throughout the entire working pad surface and fill slopes of the Location. Inspection required Operator to comply with Rule 606.d.</p> <p>Operator submitted Resolution #403659934 stating CA has been completed.</p> <p>It was observed in this inspection that work to address the corrective action has not been performed, or has been inadequate; trash/debris/rubbish/etc..., including trash items documented in the previous inspection, observed throughout the Location.</p> <p>Corrective action per Inspection #696205478 has not been addressed; corrective action and date remains applicable.</p>                         |       |  |
| Corrective Action: | Corrective action per Inspection #696205478: Comply with Rule 606.d  | Date: |  |
| Type               | STORAGE OF SUPL  |       |  |
| Comment:           | <p>Inspection #696205478 observed Various unused equipment, containers, etc... throughout the entire working pad surface of the Location; pipe and equipment not needed for production for this Location being stored on the north and east end of the Location. Inspection required Operator to comply with Rule 606.a.</p> <p>It was observed in this inspection that the unused equipment stored on the north and east end of the Location has been removed. The portion of the CA has been resolved; Various unused equipment remains improperly stored throughout Location.</p> <p>Corrective action per Inspection #696205478 has not been addressed; corrective action and date remains applicable.</p> |       |  |
| Corrective Action: | Corrective action per Inspection #696205478: Comply with Rule 606.a  | Date: |  |
| Type               | WEEDS  |       |  |
| Comment:           | <p>Refer to inspection #696205478 regarding corrective action requirements. A followup inspection will be conducted at a future date to determine compliance with Rule 606.c and 1003.f requirements.</p>  |       |  |
| Corrective Action: |  | Date: |  |

Overall Good:

| <b>Spills:</b>     |  |        |                         |
|--------------------|--|--------|-------------------------|
| Type               | Area   | Volume |                         |
| Comment:           | Secondary containment measure (stock tank) placed under lines leading from production equipment on the west end of the Location is inadequate to contain a spill or release. This has resulted in spills outside of containment and impacted soils. See Photos 34-35.  |        |                         |
| Corrective Action: | Install or repair secondary containment device to adequately contain a spill or release from lines at production equipment.  |        | Date: <u>03/16/2024</u> |
| Comment:           | Production equipment throughout the Location (including lines at the tank battery, separators/sheds on the west end of the pad, pipe riser on the southeast end of the Location, etc...) have not been maintained in a good mechanical condition.<br><br>This has resulted in spills, releases and impacted soils/materials within the tank battery facility, at the base of production equipment and working pad surface throughout the entire Location.  |        |                         |
| Corrective Action: | Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.   |        | Date: <u>03/28/2024</u> |
| Comment:           | Inspection #696205478 observed multiple containment measures (Honey Pots, stock tanks, etc.), as well as containers such as buckets, were observed filled with fluids.<br><br>Inspection required Operator to remove and properly dispose fluids.<br><br>Operator submitted Resolution #403659934 stating CA has been completed.<br><br>It was observed in this inspection that the corrective action has not been resolved; fluids observed remaining within the honeypots, and other containment measures at production equipment identified in inspection #696205478. Corrective action has not been resolved and remains applicable. |        |                         |
| Corrective Action: | Corrective action per inspection #696205478: Remove and properly dispose fluids within containment.  |        | Date:                   |
| Comment:           | Production equipment throughout the Location (including lines at the tank battery, separators/sheds on the west end of the pad, pipe riser on the southeast end of the Location, etc...) have not been maintained in a good mechanical condition.<br><br>This has resulted in spills, releases and impacted soils/materials within the tank battery facility, at the base of production equipment and working pad surface throughout the entire Location.  |        |                         |
| Corrective Action: | Clean up spills/releases per Rule 912.a. Clean/Remediate impacts to Table 915-1 standards.   |        | Date: <u>04/13/2024</u> |

In Containment: No

Comment:

Multiple Spills and Releases?

| <b>Equipment:</b> |   | corrective date |
|-------------------|---|-----------------|
| Type:             | # |                 |
|                   |   |                 |

|                    |  |       |  |
|--------------------|--|-------|--|
| Comment:           | <p>Inspection #696205478 observed that BMPs to prevent wildlife access to, or allow wildlife egress from containment measures for multiple motor oil, methanol and/or glycol tanks were observed to be missing. Inspection required Operator to install or repair wildlife protection equipment.</p> <p>Operator submitted Resolution #403659934 stating CA has been completed.</p> <p>It was observed in this inspection that the corrective action has been resolved; netting/mesh material has been placed over the containment measures to minimize wildlife access.</p> |       |  |
| Corrective Action: |  | Date: |  |
| Type:              | #  |       |  |
| Comment:           | <p>Inspection #696205478 observed that lines at the tank battery facility lacked required plug/cap.</p> <p>Inspection required operator to Plug/cap lines at tank battery.</p> <p>Operator submitted Resolution #403659934 stating CA has been completed.</p> <p>It was observed in this inspection that caps/plugs have not been installed at the loadlines of the tanks.</p> <p>Corrective action per inspection #696205478 has not been addressed and remains applicable.</p>   |       |  |
| Corrective Action: | Corrective action per inspection #696205478: Plug/cap lines at tank battery to comply with Rule 603.i  | Date: |  |

**Venting:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Flaring:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |



**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 \_\_\_\_\_

Comment \_\_\_\_\_

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

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

Comment \_\_\_\_\_

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 [See "COGCC Comments" at the end of this report.](#)

Corrective Action **Corrective action per inspection #696205478: Comply with Rule 1003.b- conduct interim reclamation on the Location including, but not limited to, compaction alleviation, recontouring/regrading, replacement of topsoil and revegetation activities on areas not needed for production. Ensure the seed mixture used is provided by the Surface Owner, or Location Soil Conservation Service. BMPs to stabilize the seeded soils will be required upon completion of revegetation activities. Continue to monitor and manage interim areas until Location receives a passing final reclamation inspection.**

Date \_\_\_\_\_

Overall Interim Reclamation **Fail**

**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: **It was observed in this inspection that stormwater and erosion control BMPs were missing or insufficient on the Location:**

-BMPs to stabilize the working pad surface are no longer in proper functioning condition; control measures to minimize tracking inadequate; control measures to minimize off-site sediment transport by equipment, such as vehicle tracking pad, also not observed.

-Slopes (Cut/Fill) of the location largely bare; erosion degradation evident resulting in degradation and sediment transport. BMPs to stabilize, as well as to minimize erosion, degradation and sediment transport missing or insufficient.

Corrective Action: **Comply with Rule 1002.f.** Date: 03/16/2024

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

| Comment  | User       | Date       |
|--|------------|------------|
| <p><b>INTERIM RECLAMATION</b></p> <p>Inspection #696205478 observed that interim reclamation of areas not reasonably needed for production (North/east ends of the Location) has not been performed on the Location. Inspection required Operator to comply with Rule 1003.b.</p> <p>Operator submitted Resolution #403659934 stating CA has been completed.</p> <p>It was observed in this inspection interim reclamation work to reduce the Location to only areas reasonably needed for production has not been performed. Corrective action has not been addressed.</p> <p>It was observed in this inspection that the interim areas and slopes on the west and northwest end of the Location are predominantly bare, and not progressing towards 1003 standards. Additional reclamation efforts will also be required within these areas.</p> | trujilloam | 03/13/2024 |

**Attached Documents**

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

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 403719212    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6466520">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6466520</a> |
| 696205677    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6466503">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6466503</a> |