

**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:

06/14/2024

Submitted Date:

06/18/2024

Document Number:

696205881

**FIELD INSPECTION FORM**Loc ID 430927 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

ECMC 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:**

21 Number of Comments

6 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	
Heil, John		john.heil@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
430924	WELL	PR	03/01/2023	OW	103-11953	BHR Fed J22-15-397-2RH	RI
430927	LOCATION	AC			-	BHR J22-397	RI
453617	WELL	EP	12/28/2019	LO	103-12295	BHR Fed J22-15-397-4RH	RI

**General Comment:**

On 6/14/2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Anschutz Exploration Corp's BHR J22-397 Location in Rio Blanco County, Colorado.

Location is Fee Surface, with Fed Minerals.

This is also a follow-up inspection to #696205473, and #696205678 to document compliance for the following corrective actions:

- Interim Reclamation of areas not needed for production
- Spill/Release
- Good Housekeeping (Trash, debris, unused equipment)
- Spill prevention and containment measures
- Protection of topsoil / Weeds

It was observed in this inspection that the corrective actions regarding Good Housekeeping, mechanical condition, fluids, Form 19 reporting requirements, and stormwater have been resolved.

Spill cleanup is ongoing- CA will remain applicable until addressed in its entirety.

Corrective actions regarding Interim Reclamation, anchor marking requirements and topsoil protections

Refer to the "Location", "Environmental", "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: ☐

<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	Location		
Corrective Action:		Date:	
Type	CONTAINERS		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	OTHER		
Comment:	Topsoil stockpile		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 1-888-696-1300 / 911

Corrective Action:

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

**Good Housekeeping:**

Type		
Comment:	Good Housekeeping CAs per Inspection Nos. 696205473 and 696205678 have been resolved.	
Corrective Action:		Date:

Overall Good: ☒

<b>Spills:</b>			
Type	Area	Volume	
Comment:	<p>Previous inspections observed spills throughout the working pad surface of the Location. Inspections required Operator to comply with Rule 912.a and to clean spills/impacts to Table 915-1 cleanup concentrations.</p> <p>Though work to address the CA is in process, stained soils/impacts remain evident on the Location. CA will remain applicable until addressed in its entirety.</p>		
Corrective Action:	Clean up spills/releases per Rule 912.a. Clean/Remediate impacts to Table 915-1 standards.		
			Date:

Comment:	Maintenance to ensure equipment is in good mechanical condition is ongoing. Leaking observed at separator equipment, and other equipment on the northeast end of the Location appears to have been controlled.  Operator on Location indicated a hole exists at the produced water tank. Operator plans on removing tank. Spill appears to be ongoing at tank; spill is within containment and, per Operator on site, is being cleaned/removed with use of absorbant (diaper) materials.  It is noted that work to address the CA is in process, however, CA will remain applicable until addressed in its entirety and all facilities on the location have been maintained in a good mechanical condition.		
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:	

In Containment:	Yes
Comment:	CAs regarding spills within honeypots, secondary containment at the battery facility, secondary containment at compressor equipment, and spill at the water pump risers on the southwest end of the Location have been resolved.  Supplemental Form 19 has been submitted per CAs.
<input type="checkbox"/> Multiple Spills and Releases?	

<b>Equipment:</b>			corrective date
Type:	#		
Comment:	See "Comment #1" at the end of this report.		
Corrective Action:	Install or repair secondary containment measure; ensure containment measure remains impervious to contain a spill or release.	Date:	

<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:		Date:	

<b>Flaring:</b>			
Type			
Comment:			
Corrective Action:		Date:	

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Environmental

Spill/Remediation:

Comment: Spill from pipe equipment on the southwest end of the Location. Refer to Form 19 #403632910 for additional details.

Inspection #696205678 observed that Operator has excavated and improperly stockpiled the potentially impacted soils on the southwest end of the Location; Operator only placed tarp liner beneath the material; no other BMPs implemented in conjunction with the liner in order to ensure the potentially impacted materials are contained; material observed to have spilled beyond the tarp liner, commingling with stormwater on the pad surface. This is improper stormwater management, materials handling and management of E&P waste, and inspection required Operator to comply with Rule 1002.f, 902 and 905.

It was observed in this inspection that the impacted materials have been placed within a lined, earthen containment. BMP appears to be in proper functioning condition at time of inspection. This CA has been resolved.

Corrective Action:		Date:	
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Emission Control Burner (ECB):	
Comment:	
Pilot:	Wildlife Protection Devices (fired vessels):

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: OTHER, 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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment See "Comment #2" at the end of this report.

Corrective Action

CA Per Inspection #696205473:

Comply with Rules 1002.c, 1003.f and 606.c. Ongoing weed management required until site receives a passing final reclamation inspection.

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? \_\_\_\_\_ Fail \_\_\_\_\_

Comment

Inspection #696205678 observed that the Anchors on the east and northeast end of the Location lack proper marking pursuant to Rule 1003.a and 603.j.

It was observed in this inspection that the anchors on the west, northwest and northeast corners of the Location have been remarked pursuant to Rules 1003.a and 603.j.

Anchor and marker on the southeast end of the Location has been buried- marker has not been installed or maintained. This CA remains applicable.

Corrective Action

CA Per Inspection #696205678:

Comply with Rule 1003.a and 603.j

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? **Fail** \_\_\_\_\_

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 **Fail** \_\_\_\_\_ 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 "Comment #3" at the end of this report.](#)

Corrective Action **Corrective action per inspection #696205473:**

Date \_\_\_\_\_

**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.**

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:		Date
Corrective Action:		
Overall Final Reclamation	Well Release on Active Location	Multi-Well Location

<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Berms						
Ditches						
				Material Handling And Spill Prevention		Lined Containment Berm, west end of Location
Mulching						
Gravel						WPS
Other						Slope Drains. Erosion logs, rip-rap and lining.
Compaction						WPS
Comment:	Stormwater corrective actions per inspection #696205678 have been resolved. BMPs appeared to be in proper functioning condition at time of inspection.					Date:
Corrective Action:						
Pits:	<input type="checkbox"/> NO SURFACE INDICATION OF PIT					

ECMC Comments		
Comment	User	Date
<p>COMMENT #1</p> <p>Inspection #696205678 observed that the partially buried containment BMP behind the compressor unit was not in proper functioning condition; lines leading into BMP are either leaking, and/or have not been properly sealed to the containment measure. Spills observed around the containment BMP. Inspection required Operator to install or repair secondary containment measure and to ensure containment measure remains impervious to contain a spill or release.</p> <p>It was observed in this inspection the secondary containment BMP remains unchanged and inadequate. It is noted however, that work to address the compliance issue does appear to be in process; soils around the containment have been excavated and spill cleanup is in process, though not complete, on the Location.</p> <p>CA will remain applicable until work has been addressed in its entirety.</p>	trujilloam	06/18/2024



<p><b>COMMENT #2</b></p> <p>Inspection #696205473 observed that BMPs to prevent weed establishment was inadequate at the topsoil stockpile; Undesirable Plant Species, including various mustard species (e.g. Chorispura tenella) observed over much of the topsoil stockpile. Inspection required Operator to comply with Rules 1002.c, 1003.f and 606.c.</p> <p>Unable to find evidence that BMPs and weed management activities to keep the topsoil stockpile free of Undesirable Plant Species have been implemented. Topsoil stockpile remains predominantly Undesirable Plant Species including Cheatgrass and mustards; work to address the corrective actions have not been performed, or has been inadequate.</p> <p>It is also noted that additional reclamation efforts have been conducted on the Location, however, topsoil stockpile remains intact- topsoil material has not been replaced over interim areas during reclamation work.</p>	trujilloam	06/18/2024
<p><b>COMMENT #3</b></p> <p>Inspection #696205473 and #696205678 observed that interim reclamation pursuant to 1003 Rules has not been performed on the Location; areas on the west end of the Location are not reasonably needed for production operations on the Location, and require reclamation. Areas on the south end of the Location have not been reclaimed (gravel/rock material/road base evident and require removal). A 2nd access road exists on the east end of the Location; access road is unnecessary and also requires reclamation. Inspection required Operator to comply with Rule 1003.b.</p> <p>It was observed in this inspection that interim reclamation has NOT been conducted in accordance with 1003 Rules.</p> <p>- Unable to find evidence that compaction alleviation (Cross-rippled to a minimum depth of 18 inches) was performed. See photos 7 in the attached document for example. Operator appears to have only roughened the top 1-3 inches of soil; compaction issues evident. Operator also appears to have mixed any gravel/road base material that was previously identified within these areas, rather than removing the material per CAs.</p> <p>-The topsoil stockpile on the east end of the Location remains intact; Operator has not replaced topsoil during reclamation work.</p> <p>This corrective action has not been addressed and remains applicable.</p>	trujilloam	06/18/2024
<p>Form 2 Permit to drill for the BHR Fed #J22-15-397-4RH well (05-103-11953) expired 12/28/2019.</p> <p>Submit a Form 4 to abandon well.</p>	trujilloam	06/18/2024

**Attached Documents**

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

Document Num	Description	URL
403828793	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6591435">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6591435</a>
696205882	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6591429">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6591429</a>