

**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:

06/25/2024

Submitted Date:

07/02/2024

Document Number:

696205936

FIELD INSPECTION FORMLoc ID 316762 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 6720

Name of Operator: ROBERT L BAYLESS PRODUCER LLC

Address: 621 17TH ST STE 2300

City: DENVER State: CO Zip: 80293

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

5 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
		notices@rlbayless.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
232709	WELL	PA	06/14/2017	GW	107-06123	GRASSY CREEK COAL CO 1-24	RI

General Comment:

On 6/25/2024, NW Reclamation Specialist Trujillo, Reclamation Specialist Maxwell and Reclamation Supervisor Arthur conducted a final reclamation and stormwater inspection at ROBERT L BAYLESS PRODUCER LLC's Grassy Creek Coal Co #1-24 location in Routt County, Colorado.

The following compliance issues were observed during this inspection:

- Final Reclamation
- Weeds
- Stormwater

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

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	See "COGCC Comments" at the end of this report.		
Corrective Action:	Comply with Rules 1004.e and 606.c and conduct weed management; Oil and Gas Locations will be kept free of all Undesirable Plant Species. Ongoing weed monitoring/management required until Location receives a passing final reclamation inspection		Date: <u>07/09/2024</u>

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:

Inspected Facilities									
Facility ID:	<u>232709</u>	Type:	<u>WELL</u>	API Number:	<u>107-06123</u>	Status:	<u>PA</u>	Insp. Status:	<u>RI</u>
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

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
SEGREGATION _____

Comment _____

Corrective Action _____ Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____ Date _____

1002E. SURFACE DISTRURBANCE 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? **Fail**

RESTORATION AND REVEGETATIONCropland

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 _____

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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control **Fail**

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

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

Corrective Action: _____ Date **08/02/2024**

Comply with 1004 rules and conduct reclamation including, but not limited to, compaction alleviation, recontouring/reggrading, replacement of topsoil and revegetation activities at the Location and access road. Ensure erosion controls are implemented to stabilize the seeded soil pursuant to Rule 1002.f. Operator shall comply with Section 2 (Appendix B) of the "Rule 915.b - SOIL SUITABILITY FOR RECLAMATION" Operator Guidance document (January 5, 2022) for replacement soils to be imported onto the Location.

Continue to monitor and manage Location until site receives a passing final reclamation inspection.

Overall Final Reclamation

Fail

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

Corrective Action: **Comply with Rule 1002.f- install or repair required stormwater and erosion control BMPs on the Location to minimize erosion, degradation and sediment transport. Ensure BMPs are installed in accordance with good engineering practices and maintained in proper functioning condition. Ongoing stormwater monitoring/management required until Location receives a passing final reclamation inspection.**

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>It was observed in this inspection that Reclamation has not been performed in accordance with 1004 Rules:</p> <p>-Access road has not been recontoured/reggraded and reclaimed. Very minor contour work observed on Location.</p> <p>-Soils observed on Location are largely subsoil material; unable to find evidence that topsoil material was replaced during reclamation activities; if topsoil had been replaced, lack of erosion control measures likely resulting in soils being eroded off site. No topsoil stockpiles apparent on Location. Additional soil will likely be required; replacement subsoil should be of the same quality as the reference soil and complies with Table 915-1. Refer to Section 2.2 and 2.3 within the "Rule 915.b - SOIL SUITABILITY FOR RECLAMATION" Operator Guidance document (January 5, 2022) for requirements regarding topsoil importation.</p> <p>-Location is predominantly bare/exposed. Vegetation observed establishing on the Location is mostly Undesirable Plant Species including Houndstongue, Canada thistle, Bulbous Bluegrass, Bull thistle and Field Bindweed. Ongoing monitoring and management to keep Location free of Undesirable Plant Species does not appear to be occurring.</p> <p>-Additionally, stormwater and erosion control monitoring and management also does appear to be occurring; BMPs to manage runoff in a manner that minimizes erosion, degradation and sediment transport was not observed; erosion degradation observed on the west and northern areas of the Location, and along the access road.</p>	trujilloam	07/02/2024

Attached Documents

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

Document Num	Description	URL
696205937	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6609628