

**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:

07/18/2024

Submitted Date:

07/29/2024

Document Number:

713900784**FIELD INSPECTION FORM**Loc ID 486289 Inspector Name: Hansen, Logan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC Operator Number: 47120Name of Operator: KERR MCGEE OIL & GAS ONSHORE LPAddress: P O BOX 173779City: DENVER State: CO Zip: 80217-**Status Summary:**

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

Findings:

10 Number of Comments

2 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 |
|-------------------|-------|------------------------------|---------|
| , | | COGCCInspections@Oxy.com | |
| Arthur, Denise | | denise.arthur@state.co.us | |
| Kirschner, Steven | | steven.kirschner@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|---------|---------------|-------------|
| 486289 | LOCATION | AC | 03/19/2024 | | - | CLOVER 2-29HZ | CI |

General Comment:

This is a Construction and Stormwater Inspection in response to a Form 42: Notice of Construction- Document #403847927.

The following compliance issues were observed during the inspection:

- 1) 1202.a.8 - Migratory bird ground nesting survey requirement
- 2) 405.b - Notice of Construction requirement

Location Construction

Location ID: 486289 CDP: _____

Comment: Based on Copernicus imagery it appears that the Operator had begun construction on the location prior to the date posted as the start date on the Form 42. Refer to attached inspection photos.

Corrective Action: Per Rule 405.b, Operators will provide the Commission written notice 2 business days in advance of commencing construction or a major change at any Oil and Gas Location or Oil and Gas Facility. Such notice will be provided on a Form 42, Field Operations Notice - Notice of Construction or Major Change. Construction of the location appears to have begun by 07/11/2024 based on Copernicus imagery. This location is out of compliance with Rule 405.b, and is being referred to Enforcement.

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

Comment: Construction occurred prior to completion of migratory bird ground nesting surveys. ECMC staff was in contact with Operator who provided the delayed nesting survey on (7/18/24). These surveys were completed the day of the inspection (7/18/24) after construction and topsoil removal had already begun. Refer to attached inspection photos for details.

Corrective Action: Per Rule 1202.a.8, Operators will conduct pre-construction nesting migratory bird surveys within the approved disturbance area prior to any vegetation removal during the nesting season (April 1 to August 31). Operator submitted survey reports do not conform with the requirements of Rule 1202.a.8, based on the protocol being performed (7/18/24) after surface disturbance and removal of vegetation had already begun. This location is out of compliance with Rule 1202.a.8, and is being referred to Enforcement.

Date: _____**Comment:** _____**Corrective Action:** _____**Date:** _____**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: | 486289 | Type: | LOCATION | API Number: | - | Status: | AC | Insp. Status: | CI |
| 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: DRY LAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____ In _____

Comment _____

At the time of inspection topsoil was in the process of being salvaged and stored along the Eastern perimeter of the location disturbance. Per Rule 1002, Operator shall segregate and store the entire topsoil horizon.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process _____

Comment _____

Once topsoil salvage is complete, Per Rule 1002.c., all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Per Rule 1002.c., BMPs to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ In Process _____

Comment _____

Per Rule 1002.e.(1), Operator shall adequately construct and stabilize the entire well pad area, including cut and fill slopes, to control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination.

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 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 Operator shall comply with interim reclamation timing requirements.

Corrective Action _____ Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: DRY LAND

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: Temporary BMPs have been installed (ditch and berm) around the entire perimeter during the construction phase of the location. More permanent BMPs should be installed upon the completion of pad construction. A follow-up stormwater inspection will be conducted at a future date to ensure compliance with Rule 1002.f. standards. Refer to the ECMC Comments section for additional stormwater compliance information.

Corrective Action: Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments

| Comment | User | Date |
|--|---------|------------|
| At the time of inspection there was no 2A posted on the location and ECMC Staff talked with onsite Operator representatives that noted they were in the process of amendments though the Form 2A should still be posted. In a follow up email Operator representative emailed staff a copy of the 2A stating they had the complete 2A and posted a physical copy onsite later that day. | hansenl | 07/23/2024 |
| Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stockpiles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices. | hansenl | 07/19/2024 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------------|---|
| 713900798 | Inspection photos | https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6643254 |