

FORM  
INSPRev  
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: 47120  
Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP  
Address: P O BOX 173779  
City: 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 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: 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

<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: <span style="color: blue;">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.</span></p>						Date: _____
<p>Corrective Action: _____</p>						
<p><b>Pits:</b>     <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

ECMC Comments		
Comment	User	Date
<span style="color: blue;">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.</span>	hansenl	07/19/2024
<span style="color: blue;">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.</span>	hansenl	07/23/2024

**Attached Documents**

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

Document Num	Description	URL
403869623	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6643275">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6643275</a>
713900798	Inspection photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6643254">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6643254</a>