

**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:

12/25/2024

Submitted Date:

01/03/2025

Document Number:

718100138**FIELD INSPECTION FORM**Loc ID 487080 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:                     **Operator Information:**ECMC Operator Number: 3104Name of Operator: ANSCHUTZ EXPLORATION CORPAddress: 555 17TH ST STE 2400City: DENVER State: CO Zip: 80202**Status Summary:**

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

**Findings:**29 Number of Comments4 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
Roberts, James		j75rober@blm.gov	<a href="#">Rio Blanco, Moffat</a>
		lindsey.organ@aecdenvr.com	
Haverkamp, Curtis		curtis.haverkamp@state.co.us	
Katz, Aaron		aaron.katz@state.co.us	
Noto, John		john.noto@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Elm, Taylor		taylor.elm@state.co.us	<a href="#">Parks and Wildlife contact</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
487080	LOCATION	AC	06/20/2024		-	Mohee Fed 0297-17	CI

**General Comment:**

On 12/31/2024, Western Reclamation Work Lead Trujillo conducted a pre-drill construction and stormwater inspection at Anschutz Exploration Corp's Mohee Fed/0297-17 location in Rio Blanco County, Colorado.

The following compliance issues were observed during this inspection:

- 406.c- Requirement to Post Location Assessment at the Location
- 602- General Safety, damage to adjacent well marker
- 1002.b- Soil Salvage and Segregation Requirements
- 1002.f- Stormwater

Refer to the Construction, Location and Reclamation 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.

#### ADDITIONAL COMMENTS

Pursuant to Operator's Form 2A #403549787. "The Lloyd Federal 22-X-17 (Merrion Operated) location is in the 1202.d density range, however it is scheduled for reclamation by May 2024. In the event the Llyod Federal #22-X-17 location is not reclaimed by May of 2024, AEC will remit \$45,592.05 to CPW for potential indirect mitigation fee. If that is required AEC will sundry the 2A to update the Wildlife Mitigation Plan and Form 2A". As documented within inspection #696206333 (dated 09/26/2024) , the Llyod Federal #22-X-17 location (API 05-103-66126) has not been reclaimed

Including Area CPW Energy Liaison and OGLA for notification purposes.

**Location**Overall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Signage has been posted at the Topsoil Stockpiles on the south, northeast and northwest ends of the Location.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	406.d- Location Signage		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Road intersection		
Corrective Action:		Date:	

**Emergency Contact Number:**

Comment: Pursuant to Rule 406.c, A copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim Reclamation.

It was observed in this inspection that the Form 2A has not been posted on the Location

Corrective Action: **Comply with Rule 406.c**

Date: 01/10/2025

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?

**Equipment:**

Type: Other	#		corrective date
Comment:	It was observed in this inspection that during construction activities for the Mohee-Fed 0297-17, Operator appears to have damaged the well marker for the adjacent Gov't 17 -2 well. Reclamation Specialist contacted the ECMC Engineering Group, and due to the potential disturbance to the surface plug, AEC will be required to conduct additional investigation and repairs.		
Corrective Action:	<b>1) Verify that no methane leak is occurring;</b> <b>2) Recap the Gov't 17-2 (103-08101) well; Prior to cap, verify isolation by either a 15 minute bubble test or 15 minute optical gas imaging. If there is indication of flow contact ECMC Engineering.</b> <b>3) Operator shall comply with Rule 1002.b and 1002.c segregation and protection requirements to ensure the topsoil material currently stockpiled around the well marker is protected during the repair work.</b>		Date: <u>04/01/2025</u>

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Location Construction**

Location ID: 487080 CDP: \_\_\_\_\_

Comment: With use of a sUAS, it was determined that the total disturbance are of the Location is approximately 9.12 acres. This comports with the Form 2A permitted disturbed area during construction (9.74 acres).

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

**Form 2A COAs:**

Comment: Form 4 #403943516 submitted 10/2/2024. Form currently under review by ECMC Financial Assurance.

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

**Wildlife BMPs:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ 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:**

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**Summary of Operator Response to Landowner Issues:**

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**Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:**

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Inspected Facilities									
Facility ID:	487080	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: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_ Fail \_\_\_\_\_

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

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

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

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

[Hydromulch evident at stockpiles in conjunction with erosion logs along the stockpile perimeter.](#)[Continue to monitor and manage BMPs to ensure controls remain in proper functioning condition.](#)

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 Pursuant to Order 593-1 a Variance to Rule 1003.b. that provides an additional 12 months, for a total of 18 months, of time to perform interim reclamation was approved.

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

Overall Interim Reclamation

**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
Hydro Mulch						Cut and Fill Slopes
Slope Roughening	Fail					Tracking, Cut Slopes
Sediment Traps						West end of Location
Ditches						Perimeter WPS
Berms						Perimeter WPS
Waddles						Erosion Logs, Perimeter of Location.
Compaction						WPS
Hydro Mulch						Topsoil Stockpiles
Check Dams						Access Road
Drains	Fail					Slope Drain, Western end of Pad.
Waddles						Erosion Logs, Perimeter of topsoil stockpiles
Culverts						Access Road
Ditches						North and West perimeter of Location

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 measures in accordance with good engineering practices, and ensure BMPs are maintained in proper functioning condition.**

Date: 01/10/2025

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**ECMC Comments**

Comment	User	Date
<p><b>TOPSOIL SALVAGE AND SEGREGATION COMMENTS</b></p> <p>Pursuant to Rule 1002.b.(2), Operator shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper.</p> <p>With use of a sUAS, ECMC Staff measured the disturbance area and topsoil stockpiles on the Location, and calculated that Operator had salvaged and stored ~2695.78 cubic yards of topsoil material on the north and west end of the site, and ~570.24 cubic yards of topsoil material on the south end of the site; for a total of 3,266 cubic yards of topsoil material salvaged and stored.</p> <p>The pad, and areas of the Location subject to soil salvage requirements were measured to be 7.26 acres; at a minimum of 6", it is expected that at least 5,851 cubic yards of topsoil should have been salvaged and stored on the Location. Based on this information, Operator appears to have salvaged and stored an average of 3.35 inches of topsoil throughout the Location.</p> <p>Additionally, there appears to be areas where vegetation has been covered by fill material, indicating that topsoil within these areas had not been salvaged.</p> <p>This Location is currently out of compliance with Rule 1002.b requirements; this issue is currently being reviewed by staff. ECMC will contact AEC once a corrective action determination has been made.</p>	trujilloam	01/03/2025



**STORMWATER COMMENTS**

trujilloam

01/03/2025

It was observed in this inspection that stormwater and erosion control BMPs have not been installed in accordance with good engineering practices.

Operator has implemented surface roughening (tracking) at the cut slopes of the Location; Slope Tracking has been installed perpendicular to the slope contour, rather than parallel. This is not per good engineering practices/requirements, and will facilitate channelized flows as well as erosion/degradation at the slopes. Maintenance advised prior to failure.

It was also observed that the slope drain on the west end of the Location has not been installed in accordance with good engineering practice. The outlet pipe of the slope drain (toe of the fill slope) has not been properly secured, and the is missing engineered and armored outlet protections. Additional work required.

It also appears as though the inlet of the drain at the working pad surface has been constructed in such a manner that runoff will be dammed, resulting in stormwater ponding onto the pad prior to flowing over the erosion logs and discharging. ECMC Staff is advising Operator to evaluate the inlet control to ensure BMP is functioning as intended, to allow proper discharge.

**Attached Documents**

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

Document Num	Description	URL
718100139	Inspection Photos and Drone Report	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862701">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862701</a>