

**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:

04/14/2025

Submitted Date:

04/23/2025

Document Number:

718100478**FIELD INSPECTION FORM**Loc ID 312420 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10150Name of Operator: BLACK HILLS PLATEAU PRODUCTION LLCAddress: 1515 WYNKOOP ST STE 500City: DENVER State: CO Zip: 80202**Status Summary:**

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

**Findings:**6 Number of Comments2 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
,		dnr_cogccenforcement@state.co.us	
		casey.kimble@blackhillscorp.com	Principal Agent
Maxwell, Logan		logan.maxwell@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221554	WELL	PA	07/27/2007	GW	077-08156	BLAIR 1	RI
312420	LOCATION	CL			-	BLAIR-610S97W 1SWNE	RI

**General Comment:**

On 4/14/2025, Western Reclamation Work Lead Trujillo conducted a Final Reclamation inspection at Black Hills Plateau Production LLC's Blair #1 Location in Mesa County, Colorado.

Location is within the following High Priority Habitats: Severe Elk Winter Range

This inspection is a follow-up to Inspection Nos. 696204845 dated 4/17/2023, 696203693 dated 5/10/2022, and #696204247 dated 10/11/2022 to document compliance with the following corrective actions:

- Final Reclamation/Plugging and Abandonment requirements
- Stormwater

This inspection is also in response to NOAV #403384691 related to 1002.f Stormwater and 1004.a Final Reclamation requirements.

This inspection is also at the request of the Hearings Unit, in response to Docket No. 230600210 requesting a variance to 1004 Rules, to not reclaim the Location and access road.

It was observed in this inspection that the Location remains out of compliance with ECMC Rules.

Refer to the Reclamation and Stormwater sections of this inspection report for additional details.

Refer to the photo-documentation attached to this report.

Any corrective action(s) from previous inspection that have not been addressed are still applicable.

Inspected Facilities									
Facility ID:	221554	Type:	WELL	API Number:	077-08156	Status:	PA	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	312420	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI
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 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 \_\_\_\_\_

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 **Fail**

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

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: **Comply with Rule 434.a.(5) abandoned well marker requirements.** Date \_\_\_\_\_

Overall Final Reclamation In Process 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:

Corrective Action:

See "COGCC Comments" at the end of this Report.

Comply with 1002.f and install required stormwater and erosion control BMPs at the Location and access road to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be installed in accordance with good engineering practices, and maintained until Location receives a passing final reclamation inspection.

Date:

Pits:

☐ NO SURFACE INDICATION OF PIT

ECMC Comments		
Comment	User	Date
<div><div>STORMWATER</div><div>Previous inspections observed that BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation are missing or insufficient at the Location and access road; stormwater runoff has resulted in erosion at the exposed cut and fill slopes of the Location resulting in degradation and sediment transport; gully erosion also evident along access road. Inspection required Operator(s) to comply with 1002.f by 10/27/2022.</div><div>NOAV #403384691 was issued on 4/26/2023, and required Operator to comply with Rule 1002.f by 5/1/2023.</div><div>It was observed in this inspection that corrective actions and NOAV abatement requirements, to address the stormwater and erosion degradation issues have not been taken by the Operator(s); erosion, degradation and sediment transport at the Location and access road has persisted.</div></div>	trujilloam	04/23/2025

**FINAL RECLAMATION COMMENTS**

trujilloam

04/23/2025

Previous inspection observed that Final Reclamation has not been conducted in accordance with COGCC 1004 requirements; Reclamation at the Location and Access road including, but not limited to, removal of gravel, compaction alleviation, recontouring/regrading and revegetation activities has not been conducted; cut and fill slopes remain evident; noxious weed establishment evident.

Inspections also observed that Operator has left a welded plate at surface of the well as a "marker"; markers are required to be a piece of pipe not less than 4 inches in diameter and not less than 10 feet in length, of which 4 feet shall be above the general ground level; monument left at surface does not comport with abandoned well marker requirements.

Inspections required Operator to:

1) Comply with Rules 1004.a, and conduct final reclamation with, at a minimum, the removal of gravel/road base, compaction alleviation, recontouring and regrading activities to be completed by 7/31/2022, and revegetation activities required to be completed no later than 11/15/2022, and:

2) Comply with Rule 434.a.(5) well marker requirements.

On June 14, 2023, Operator submitted Docket No. 230600210 requesting a variance from Rules 1004.c.(2), 1004.d., and 1004.e.

It was observed in this inspection that final reclamation activities, pursuant to 1004 requirements, have not been conducted: Gravel/Road base has not been removed from the access road and Location; Access road and Location has not been decompacted, recontoured/regraded, and revegetation activities have not been performed. However, the overall status of the Reclamation is being considered "in process" pending resolution of the Variance Hearing Application.

It was also observed in this inspection that Operator has failed to remove and/or install a well marker that comports with ECMC Well abandonment requirements. This portion of the corrective action remains applicable.

**Attached Documents**

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

Document Num	Description	URL
404176284	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7018330">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7018330</a>
718100479	Inspection Photo and Drone Report	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7018323">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7018323</a>