

**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:

05/28/2025

Submitted Date:

07/31/2025

Document Number:

712300137

**FIELD INSPECTION FORM**

Loc ID: 316764  
Inspector Name: Maxwell, Logan  
On-Site Inspection:   
2A Doc Num: \_\_\_\_\_

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

**Findings:**  
 11 Number of Comments  
 9 Number of Corrective Actions  
 Corrective Action Response Requested

**Operator Information:**  
 ECMC Operator Number: 6720  
 Name of Operator: ROBERT L BAYLESS PRODUCER LLC  
 Address: 707 17TH STREET SUITE 2975  
 City: DENVER State: CO Zip: 80202

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
		j75rober@blm.gov	
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		htrujillo@rlbayless.com	
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**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
316764	LOCATION	AC			-	DRY CREEK FEDERAL-65N88W 14NENE	RI

**General Comment:**

On 5/28/2025, Northwest Reclamation Specialist Maxwell, EPS Neidel, Environmental Manager Blakeman, and Environmental Supervisor Fisher conducted an environmental and stormwater inspection in Routt County, Colorado.

Location is located on State Land Board Land within the following High Priority Habitats: 1202.d. Columbian Sharp Tailed Grouse Production area, Elk Production Area, Mule Deer Migration Corridor; 309.e.1. Columbian Sharp Tailed Grouse Winter Range

The following compliance issues observed were:  
 -Stormwater  
 -Stained soils  
 -Signage  
 -Wildlife Protection  
 -Good Housekeeping

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

Refer to the "Location," "Reclamation," and "Stormwater" section of this inspection report for additional details.

Refer to the photo-documentation attached to this report.

Any corrective actions from previous inspections that have not been addressed remain applicable. Any new corrective actions without corrective action dates, requires that the Operator comply with the Rules immediately or when environmental conditions permit. Location will remain out of compliance until corrective action(s) has (have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type			
Comment:	Signage at tank batteries missing Operator phone number, Emergency services number, and API numbers associated with the Tank Battery		
Corrective Action:	Comply with Rule 605.e.		Date: 09/05/2025
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
<b>Good Housekeeping:</b>			
Type	STORAGE OF SUPL		
Comment:	It was observed in this inspection that there are stockpiles of soil/material on the southeastern and western portions of the Location.  BMPs to protect the stockpiles from wind/water erosion, to minimize sediment transport, and BMPs to prevent weed establishment are missing or insufficient.		
Corrective Action:	Comply with Rules 1002.c and 1002.f and implement BMPs to protect the stockpile from erosion, degradation, sediment transport and weed establishment.  If the stockpiled materials are not necessary, materials require removal pursuant to Rule 606.a.		Date: 08/08/2025
Type	TRASH		
Comment:	It was observed in this inspection that various trash, debris and/or unused equipment was observed throughout the Location.		
Corrective Action:	Comply with Rule 606.		Date: 08/08/2025
Type	WEEDS		
Comment:	It was observed in this inspection that weeds (e.g., Canada Thistle) were located throughout the Location.		
Corrective Action:	Comply with Rule 606.		Date: 08/08/2025
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
Comment:	Stained/impacted soils observed throughout areas of the pit facility, on the access road, and the surrounding Tank battery.		
Corrective Action:	Remove and properly dispose of impacted material pursuant to Rule 912.a. Clean/remediate impacts to Table 915-1 cleanup concentrations.		Date: 08/07/2025
In Containment: No			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type			
Comment:	It was observed in this inspection that fencing is Located on several portions of the Locations, but has not been properly maintained and was observed falling over or with broken wires/posts.		
Corrective Action:	Maintain fencing on Location.		Date: 08/29/2025

<b>Equipment:</b>			corrective date
Type: Bird Protectors	#		
Comment:	It was observed in this inspection that pipes around the wellhead and tank batteries have not been properly covered to prevent access by wildlife, including birds and bats.		
Corrective Action:	Comply with Rule 902.b.- install covers or other BMPs to prevent wildlife access to the tank equipment.		Date: <u>08/07/2025</u>

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

**Paint**

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth				
Comment:	It was observed in this inspection that the secondary containment berm surround the tank on the western portion of the Location is not adequate. Portions of the berm are missing or have eroded and are no longer impervious to contain spills or releases.			
Corrective Action:	Comply with Rule 603.o.			Date: <u>08/08/2025</u>

**Venting:**

Yes/No	
Comment:	
Corrective Action:	Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

**Inspected Facilities**

Facility ID: 316764 Type: LOCATION API Number: - Status: AC 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? \_\_\_\_\_ F \_\_\_\_\_

Comment Areas of the former pit on the north end of the Location are no longer necessary for production.  
  
Upon closure of Remediation Projection #19966, these areas will require Reclamation pursuant to Rule 1003.b

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 \_\_\_\_\_ 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 <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/>
	Multi-Well Location <input type="checkbox"/>

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: It was observed in this inspection that the soils remained unstabilized in the remediation project, erosion and subsidence issues were apparent; areas surrounding the perimeter of the remediation project are lacking stormwater controls, including a proper outlet for stormwater runoff on the northwestern portion of the Location.

Maintenance is advised for wattles, which have not been installed per good engineering practices. Additionally, erosion logs used to control stormwater runoff should be used in conjunction with other BMPs per good engineering practices.

Corrective Action: **Comply with Rule 1002.f.**

Date: \_\_\_\_\_

**Pits:**  NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
712300174	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7169992">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7169992</a>