

Inspection Date: <u>11/25/2025</u>
Submitted Date: <u>11/26/2025</u>
Document Number: <u>697506045</u>

**Cartwright 25 Pad  
Facility ID 490641**

**ALL INSPECTION COMMENTS:**

This is a Construction and Stormwater Inspection in response to Form 42: Notice of construction- Document # 404438064.

ECMC staff, Chris Binschus, contacted an Operator representative regarding the perimeter stormwater BMP installation- refer to the Stormwater and COGCC Comments section.

Operator complied with the permit COA to provide reference area photos taken during the peak growing season- Doc.# 404290375.

Appears topsoil was salvaged from the access road and location, and stored along the northern perimeter of the location in compliance with Rule 1002.b. ECMC staff will perform a future assessment on topsoil quantities to verify salvaged topsoil material. Refer to the attached inspection photos.

Topsoil stockpile that remains unconsolidated and will be stabilized per the Operator plan. 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.

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

Temporary BMPs have been installed (straw wattles/erosion logs) around the entire perimeter during the construction phase of the location. More permanent BMPs will be installed upon the completion of pad construction. Refer to the COGCC Comments section for additional stormwater compliance information.

Straw wattle BMPs have not been installed per good engineering practices per Rule 1002.f. (2). Operator was notified via a phone call at the time of the inspection.

Note- vehicle tracking control (VTC) BMPs have not been installed; however, there was no sediment track out issues observed. Operator should consider installing VTC BMPs

immediately to control for potential track out issues.

#### CORRECTIVE ACTION

Comply with Rule 1002.f.(2) to install stormwater BMPs (straw wattles/erosion logs) per good engineering practices. In addition, Operator shall attach via the FIRR the stormwater installation criteria for straw wattles/erosion logs per the Operator's Field Wide Stormwater Management Plan.

#### OVERALL ECMC COMMENT:

Stormwater BMP straw wattles/erosion logs need to be trenched at a depth equal to half of the diameter of the log (~2 to 3 inches) to adequately filter stormwater runoff. Per section 4.1 in the Stormwater Management Plan "the control measure(s) must contain or filter flows in order to prevent the bypass of flows without treatment and must be appropriate for stormwater runoff from disturbed areas and for the expected flow rate, duration, and flow conditions (i.e., sheet or concentrated flow)." Current insulation of BMP will allow stormwater and erosion underneath BMP. Erosion logs are indicated in the Stormwater Management map however not mentioned in any of the sections of the Stormwater Management Plan. Erosion logs need to be included in section 7 "Summary of Best Management Practices (BMPs)"

ECMC PHOTO LOG AND COMMENTS:



**Photo 4.** Photo taken from the northwestern perimeter of location, facing West. Photo illustrates the Operator installed a perimeter stormwater BMP around the entire perimeter of the location. However, the stormwater BMP (straw wattle) was not properly installed per good engineering practices.



**Photo 5.** Close up photo taken from a section of the stormwater BMP (straw wattle) illustrating the BMP has not been trenched in per good engineering practices.



**Photo 6.** Photo taken from the northern perimeter of location, facing East. Photo illustrates the topsoil stockpile that remains unconsolidated and will be stabilized per the Operator plan.



**Photo 7.** Photo taken from the northern perimeter of location, facing West. Photo illustrates a section of the stormwater BMP (straw wattle) illustrating the BMP has not been trenched in per good engineering practices. It appears that a trench was installed, yet the straw wattle was not placed within the trench. Note- the trench may be too deep for the straw wattle.

CORRECTIVE ACTION TAKEN – PHOTO



## Wattles (W)



### Description

A wattle consists of straw, flax, or other similar synthetic materials bound into a tight tubular roll. When wattles are placed at the toe and on the face of slopes, they intercept runoff, reduce its flow velocity, release the runoff as sheet flow, and provide removal of sediment from the runoff. By interrupting the length of a slope, wattles can also reduce erosion.

### Applicability

Wattles may be suitable:

- Along the top, face, and at the grade breaks of exposed and erodible slopes to shorten slope length and spread runoff as sheet flow;
- At the end of a downward slope where it transitions to a steeper slope;
- Along the perimeter of a project;
- At the overflow location of sediment traps;
- As check dams in unlined ditches; and
- Around temporary stockpiles.

### Limitations

- Wattles on a slope of 5% or greater are not effective unless trenched.
- Difficult to move once saturated.
- If not properly staked and trenched in, wattles could be transported in high flows.
- Wattles have a very limited sediment capture zone.
- Wattles should not be used on slopes subject to creep, slumping, or landslide.
- Wattles should not be used where periodic road or surface maintenance activities are expected.

### Design Criteria

No formal design is required.

### Construction Specifications

Wattles should be either prefabricated rolls or rolled tubes of erosion control blankets. If using erosion control blankets, roll the length of erosion control blanket into a tube with a minimum of 8 inches in

diameter and bind the roll at each end and every 2 feet along the length of the roll with jute-type twine.

See Figure W-1 for wattles used to control erosion along slopes.

Locate wattles on level contours spaced as follows.

- Slope inclination of 4:1 or flatter: Fiber rolls should be placed at a maximum interval of 20 feet.
- Slope inclination between 4:1 and 2:1: Fiber rolls should be placed at a maximum of 15 feet.
- Slope inclination 2:1 or greater: Fiber rolls should be placed at a maximum interval of 10 feet.
- Turn the ends of the wattles upslope to prevent runoff from going around the roll.
- Drive stakes at the end of each wattle, space 4 feet maximum on center along the wattle, and where wattle does not firmly contact the ground surface.
- Drive stakes at an angle through the wattle to prevent upward migration of the wattle after installation.
- If more than one wattle is placed in a row, the rolls should be overlapped or tightly abutted.

### **Maintenance Considerations**

The frequency of inspections should be in accordance with the Stormwater Management Plan (SWMP). Repair or replace split, torn, unraveling, slumping rolls, or wattle damaged beyond functionality by wildlife.

Replacement due to wildlife damage may include holes larger than 2" in diameter or more than six burrowed holes per wattle unit. Wattle that has been eaten by wildlife will either be replaced with another wattle or a different BMP altogether. If the wattle is used as a sediment capture device, or as an erosion control device to maintain sheet flows, sediment that accumulates must be periodically removed in order to maintain wattle effectiveness. Sediment should be removed when sediment accumulation reaches half the distance between the top of the wattle and the adjacent ground surface.

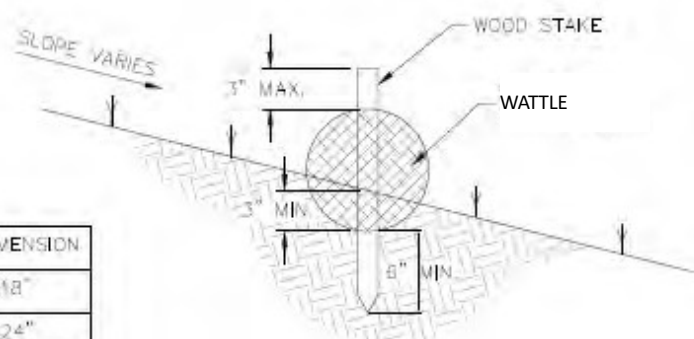
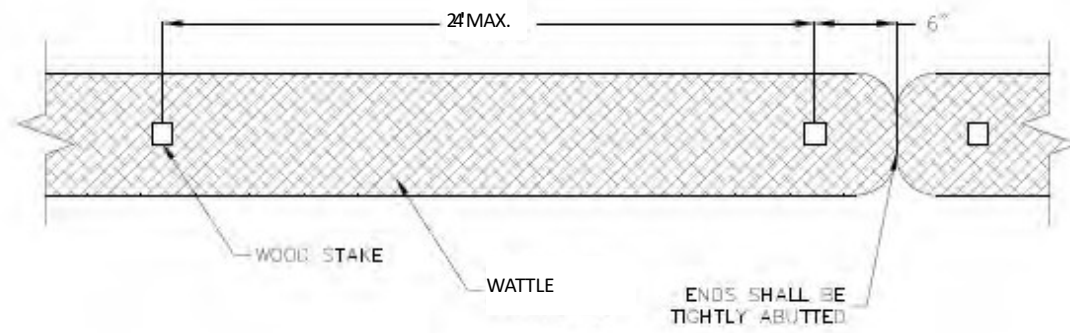
### **Removal**

Wattles are typically left in place. If wattles are removed, collect and dispose of sediment accumulation, and fill and compact holes, trenches, depressions, or any other ground disturbance to blend with adjacent ground.

### **References**

California Stormwater Quality Association (CASQA). 2003. Stormwater Best Management *Practice Handbook: Construction*. <https://www.casqa.org/store/products/tabid/154/p-167-construction-handbookportal-initial-subscription.aspx>





LOG#	STAKE DIMENSION
9"Ø	1.5"x1.5"x18"
12"Ø	1.5"x1.5"x24"
20"Ø	1.5"x1.5"x48"

Wattle Joints

W – Wattles