

**FORM INSP**  
Rev 05/11

**State of Colorado  
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



|    |    |    |    |
|----|----|----|----|
| DE | ET | OE | ES |
|----|----|----|----|

Inspection Date:  
08/19/2015

Document Number:  
680300243

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

|                     |               |               |                    |                          |             |
|---------------------|---------------|---------------|--------------------|--------------------------|-------------|
| Location Identifier | Facility ID   | Loc ID        | Inspector Name:    | On-Site Inspection       | 2A Doc Num: |
|                     | <u>219143</u> | <u>312158</u> | <u>SCHURE, KYM</u> | <input type="checkbox"/> |             |

**Operator Information:**

|                       |   |
|-----------------------|---|
| OGCC Operator Number: | <u>10380</u>                                    |
| Name of Operator:     | <u>BENCHMARK ENERGY LLC</u>                     |
| Address:              | <u>PO BOX 8747</u>                              |
| City:                 | <u>PRATT</u> State: <u>KS</u> Zip: <u>67124</u> |

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED
- INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

| Contact Name   | Phone          | Email                     | Comment         |
|----------------|----------------|---------------------------|-----------------|
| Nash, Jerry    | (316) 218-8184 | jerry@benchmarkenergy.us  | All Inspections |
| Murphy, Julie  |                | julie.murphy@state.co.us  |                 |
| Ferrin, Jeremy |                | jeremy.ferrin@state.co.us |                 |

**Compliance Summary:**

QtrQtr: NENE Sec: 12 Twp: 8N Range: 54W

| Insp. Date | Doc Num   | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 08/11/2015 | 680300192 | IJ         | SI          | ACTION REQUIRED               |          |                | No              |
| 08/10/2015 | 680300177 | IJ         | SI          | ACTION REQUIRED               |          |                | No              |
| 07/30/2015 | 680300169 | IJ         | SI          | ACTION REQUIRED               |          |                | No              |
| 07/24/2015 | 680300118 | IJ         | SI          | ACTION REQUIRED               |          |                | No              |
| 05/29/2015 | 678200181 | IJ         | EI          | ACTION REQUIRED               |          |                | No              |
| 11/06/2014 | 667200638 | SI         | SI          | ACTION REQUIRED               |          |                | No              |
| 10/17/2014 | 667200576 | SI         | SI          | ACTION REQUIRED               |          |                | No              |
| 10/14/2014 | 667200574 | SI         | SI          | SATISFACTORY                  |          |                | No              |
| 10/13/2014 | 667200572 | SI         | SI          | ACTION REQUIRED               |          |                | No              |
| 10/06/2014 | 667200567 | SI         | SI          | ACTION REQUIRED               |          |                | No              |
| 09/16/2014 | 667200518 | SI         | SI          | ALLEGED VIOLATION             |          |                | Yes             |
| 09/16/2014 | 667200469 | SI         | SI          | ACTION REQUIRED               |          |                | No              |
| 08/12/2014 | 667200364 | SI         | SI          | ALLEGED VIOLATION             |          |                | Yes             |
| 07/23/2014 | 667200231 | SI         | SI          | ALLEGED VIOLATION             |          |                | Yes             |
| 08/08/2013 | 664001188 | SI         | SI          | SATISFACTORY                  |          |                | No              |
| 07/09/2012 | 663300290 | IJ         | IJ          | ACTION REQUIRED               | I        |                | No              |
| 11/21/2011 | 664000148 | IJ         | AC          | SATISFACTORY                  | P        |                | No              |
| 10/11/2011 | 200324950 | MI         | SI          | ACTION REQUIRED               |          |                | Yes             |
| 06/16/2011 | 200312771 | MI         | AC          | ACTION REQUIRED               |          |                | Yes             |

Inspector Name: SCHURE, KYM

|            |           |    |    |                 |   |      |     |
|------------|-----------|----|----|-----------------|---|------|-----|
| 07/26/2010 | 200263867 | RT | TA | SATISFACTORY    |   |      | No  |
| 07/19/2010 | 200264964 | SR | AC | SATISFACTORY    | I |      | No  |
| 01/27/2010 | 200229253 | MI | SI | SATISFACTORY    |   |      | No  |
| 12/21/2009 | 200225699 | MI | SI | ACTION REQUIRED |   |      | Yes |
| 07/23/2009 | 200215464 | MI | SI | ACTION REQUIRED |   |      | Yes |
| 07/22/2009 | 200215463 | MI | SI | ACTION REQUIRED |   |      | Yes |
| 04/17/2008 | 200130595 | MI | AC | ACTION REQUIRED |   |      | Yes |
| 06/20/2007 | 200115791 | MI | AC | SATISFACTORY    |   | Pass | No  |
| 06/08/2006 | 200091673 | RT | AC | SATISFACTORY    |   | Pass | No  |
| 07/05/2005 | 200074145 | RT | AC | SATISFACTORY    |   | Pass | No  |
| 06/15/2004 | 200055914 | RT |    | SATISFACTORY    |   | Pass | No  |
| 04/02/2003 | 200037008 | RT | AC | SATISFACTORY    |   | Pass | No  |
| 08/02/2002 | 200029314 | MI | SI | SATISFACTORY    |   | Pass | No  |
| 07/17/2002 | 200028858 | MI | AC | ACTION REQUIRED |   | Fail | Yes |
| 08/23/2001 | 200019591 | RT | AC | SATISFACTORY    |   | Pass | No  |
| 08/04/2000 | 200008426 | RT | AC | SATISFACTORY    |   | Pass | No  |

**Inspector Comment:**

Follow-up Inspection.

**Related Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name               | Insp Status |                                     |
|-------------|------|--------|-------------|------------|-----------|-----------------------------|-------------|-------------------------------------|
| 219143      | WELL | IJ     | 02/05/2015  | SI         | 075-05972 | NW GRAYLIN D-SAND UNIT 20-W | SI          | <input checked="" type="checkbox"/> |

**Equipment:**

Location Inventory

Special Purpose Pits: \_\_\_\_\_ Drilling Pits: \_\_\_\_\_ Wells: \_\_\_\_\_ Production Pits: \_\_\_\_\_  
 Condensate Tanks: \_\_\_\_\_ Water Tanks: \_\_\_\_\_ Separators: \_\_\_\_\_ Electric Motors: \_\_\_\_\_  
 Gas or Diesel Mortors: \_\_\_\_\_ Cavity Pumps: \_\_\_\_\_ LACT Unit: \_\_\_\_\_ Pump Jacks: \_\_\_\_\_  
 Electric Generators: \_\_\_\_\_ Gas Pipeline: \_\_\_\_\_ Oil Pipeline: \_\_\_\_\_ Water Pipeline: \_\_\_\_\_  
 Gas Compressors: \_\_\_\_\_ VOC Combustor: \_\_\_\_\_ Oil Tanks: \_\_\_\_\_ Dehydrator Units: \_\_\_\_\_  
 Multi-Well Pits: \_\_\_\_\_ Pigging Station: \_\_\_\_\_ Flare: \_\_\_\_\_ Fuel Tanks: \_\_\_\_\_

**Location**

**Lease Road:**

| Type   | Satisfactory/Action Required | comment   | Corrective Action | Date |
|--------|------------------------------|---|-------------------|------|
| Access | SATISFACTORY                 | Lease road is repaired. See attached photographs. |                   |      |

**Signs/Marker:**

| Type     | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|----------|------------------------------|---------|-------------------|---------|
| WELLHEAD | SATISFACTORY                 |         |                   |         |

Emergency Contact Number (S/A/V): SATISFACTORY

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

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

Corrective Action:

**Good Housekeeping:**

| Type            | Satisfactory/Action Required | Comment | Corrective Action                   | CA Date    |
|-----------------|------------------------------|---------|-------------------------------------|------------|
| STORAGE OF SUPL | ACTION REQUIRED              |         | Remove tubing from latest workover. | 09/18/2015 |

**Spills:**

| Type   | Area | Volume | Corrective action | CA Date |
|--|------|--------|-------------------|---------|
| <input type="checkbox"/> Multiple Spills and Releases? |      |        |                   |         |

**Equipment:**

| Type  | # | Satisfactory/Action Required | Comment                | Corrective Action | CA Date |
|-------|---|------------------------------|------------------------|-------------------|---------|
| Other | 0 | SATISFACTORY                 | No change in equipment |                   |         |

**Venting:**

| Yes/No | Comment |
|--------|---------|
|        |         |

**Flaring:**

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|------|------------------------------|---------|-------------------|---------|
|      |                              |         |                   |         |

**Predrill**

Location ID: 219143

**Site Preparation:**

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/A/V:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Wildlife BMPs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Stormwater:**

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

**Staking:**

**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:

**Facility**

Facility ID: 219143 Type: WELL API Number: 075-05972 Status: IJ Insp. Status: SI

**Idle Well**

Purpose:  Shut In  Temporarily Abandoned Reminder: \_\_\_\_\_

S/A/V: ACTION CA Date: 11/05/2014

CA: Perform unresolved corrective actions from Doc# 678200181, 680300192, 680300177, 680300169 & 680300118.

Comment: Reference Doc# 680300118, 680300169, 680300177, 680300192 & 678200181 for corrective actions and related corrective action dates.

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Description: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_  
 Comment: \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_  
 Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_  
 Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well:** \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_  
 DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**Field Parameters:** \_\_\_\_\_

Sample Location: \_\_\_\_\_

| <b>Complaint:</b> |                 |             |  |               |
|-------------------|-----------------|-------------|--|---------------|
| Tracking Num      | Category        | Assigned To | Description  | Incident Date |
| 200431389         | PROPERTY DAMAGE | Young, Rob  | I filed a complaint last fall when Benchmark Energy Jerry Nash had a Work over rig on an injection well in my wheat field. I have made two written attempts to have the cement that was spilled cleaned up. Once in January and one more time 2 weeks ago with a deadline of May 1. I need to plant a polinator in that area for NRCS and USDA Conservation program. Cement is high in PH this does not promote plant growth. What am I going to do when I am not able to get the plants to grow because you have allowed this mess to be here as long as it has? I hope this is not the case. Hopefully it will clean right up. | 05/05/2015    |
| 200431389         | SPILLS          | Young, Rob  | See above  | 05/05/2015    |
| 200414337         | AESTHETIC S     | Young, Rob  | Landowner alleges that wheel ruts, cement and oily water from recent workover operations have been left at the location.   | 10/17/2014    |

Emission Control Burner (ECB): \_\_\_\_\_  
 Comment: \_\_\_\_\_  
 Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**  
 Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_  
 Land Use: \_\_\_\_\_  
 Comment: \_\_\_\_\_

1003a. Debris removed? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Unused or unneeded equipment onsite? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Pit, cellars, rat holes and other bores closed? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Guy line anchors removed? \_\_\_\_\_ CM \_\_\_\_\_

CA \_\_\_\_\_ CA Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_ CM \_\_\_\_\_

CA \_\_\_\_\_ CA 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 \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

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

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 \_\_\_\_\_

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 |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Other            | Fail            | Other                   |                       |               |                          |         |

|          |   |                  |            |
|----------|---|------------------|------------|
| S/A/V:   | <b>ACTION REQUIRED</b>  | Corrective Date: | 11/05/2014 |
| Comment: | Lease road has been recently repaired. Well-site remains unresolved from previous (past due) corrective action dates. |                  |            |
| CA:      | Implement BMP's for stormwater runoff erosion control and maintenance.  |                  |            |
| Pits:    | <input type="checkbox"/> NO SURFACE INDICATION OF PIT   |                  |            |

**Attached Documents**

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

| Document Num | Description                                      | URL   |
|--------------|--|---|
| 680300281    | Lease Road (Repaired)                            | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666665">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666665</a> |
| 680300282    | Wellhead-Sign-Surface (spills)- Tubing on ground | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666666">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666666</a> |
| 680300283    | Wellhead-Sign-Surface (spills)- Tubing on ground | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666667">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666667</a> |
| 680300284    | Surface spill/release pathway                    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666668">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3666668</a> |

## **ACTION REQUIRED**

**ANY ACTION REQUIRED** items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)