

**FORM
INSP**Rev
X/15**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:

09/05/2018

Submitted Date:

09/06/2018

Document Number:

682403966**FIELD INSPECTION FORM**
 Loc ID 318239 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 39560Name of Operator: TOP OPERATING COMPANYAddress: 3609 S WADSWORTH BLVD STE 340City: LAKEWOOD State: CO Zip: 80235**Status Summary:**

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

Findings:6 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		Mimi.Larsen@coag.gov	Assistant Attorney General
		dnr_cogccenforcement@state.co.us	COGCC Enforcement
HERRING, MURRAY J	(303) 727-9915 x203	murray.herring@topoperating.com	
HERRING, PAUL	(303) 727-9915	paul.herring@topoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
318239	LOCATION	CL			-	KNOX-62N67W 23SENW	RI

General Comment:

This is a follow-up Final Reclamation Inspection to Document #682403860- last inspected on 7/30/2018. Well was plugged and abandoned on 7/11/2013. Any corrective actions from previous inspections that have not been addressed are still applicable. Where corrective actions from the previous inspection report remain unresolved, corrective action dates remain unchanged.

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 REVEGETATIONCropland

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 Pass Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed Fail

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation Fail 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: Since the previous inspection on 7/30/2018, the surface owner has recently cultivated the ~30 acre parcel, including this P&A location. Upon further investigation, the recent cultivation has revealed that the Operator has failed to remove gravel, as large rock fragments and concrete material were observed. Little to no rock fragments of similar size or density were observed in reference areas. This indicates the Operator failed to remove gravel and perform compaction alleviation. Refer to the attached inspection photos for more detail.

Corrective Action:	Comply with Rule 1004 to remove all large rock fragments and concrete material. Operator shall perform proper compaction alleviation by cross-ripping to a depth of eighteen (18") inches throughout all disturbance areas associated with this P&A location.	Date	07/30/2018
Overall Final Reclamation	Fail	Well Release on Active Location	<input type="checkbox"/>
		Multi-Well Location	<input type="checkbox"/>

COGCC Comments

Comment	User	Date
Copied from the previous inspection on 7/30/2018: Operator falsely submitted a Final Reclamation Complete Notice on 1/28/2016 (Doc. #400979867), prior to a failing Final Reclamation Inspection on 1/29/2016 (Doc. # 681900494).	binschusc	09/06/2018
Previous corrective action inspection:	binschusc	09/06/2018
7/30/2018 (Doc.# 682403860): Corrective Action- Comply with Rule 1004.		

Attached Documents

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

Document Num	Description	URL
401756200	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572353
682403967	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4572349