

**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:

08/14/2019

Submitted Date:

08/15/2019

Document Number:

696200596**FIELD INSPECTION FORM**Loc ID 433129 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10581Name of Operator: ABILENE PERFECT ENERGY JV LLCAddress: 4600 PECOS STREETCity: DENVER State: CO Zip: 80211**Status Summary:**

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

**Findings:**

- 16 Number of Comments
- 
- 10 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
		charles@perfectenergy.us	
		almc@perfectenergy.us	
		patricia@perfectenergy.us	
		dnr_cogccenforcement@state.co.us	
		malick@perfectenergy.us	
Freese, Steve		steve.freese@state.co.us	All SLB Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
433121	WELL	PR	12/01/2015	SI	073-06540	Surprise 12-54-36-6	RI

**General Comment:**

This is a follow-up interim reclamation and stormwater inspection to inspection doc. #67313723 dated 8/5/2016, doc. #689900063 dated 07/28/2017, doc #682503283 dated 4/30/2018, doc #682503510 dated 6/19/2018, doc. #68250330 dated 8/14/2018, doc. #682504269 dated 12/12/2018, and doc. #696200305 dated 06/19/2019.

This inspection is to document compliance for the following corrective actions:

210.e: Install sign with correct operator information.

210.d: Install signage on tanks.

603.f: Removal of unused equipment, and trash debris.

603.f: Removal of stained soil/gravel pile and debris.

907.e: Properly treat or dispose oily waste/ stained soils at wellhead, and areas around well.

906.d(1): Repair or install berms, or other secondary containment at tanks.

1002.e(4): Install gate to allow vehicle traffic to travel on access road, to mitigate and minimize surface disturbance.

1002.f: Repair erosion degradation and install BMPs

1003.a: Reclamation on unvegetated areas of the interim and areas disturbed due to stormwater runoff

It was observed that corrective actions from previous inspections listed above have not been addressed.

Refer to the photo-documentation of the observed compliance issues attached to this report.

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

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location			
<b>Lease Road:</b>			
Type	Access		
comment:	Previous inspections documented that a fence has been constructed across the access road (coordinates 38.94974 / -103.39839), forcing vehicle traffic off the road to utilize a gap in the corner of the fence to the east. Operator has been notified that a gate should be installed to minimize surface disturbance to areas off the access road. Operator has failed to mitigate and minimize surface disturbance in accordance to 1002.e(4)		
Corrective Action:	Install a gate to allow vehicle traffic to travel on access road.		Date: 07/11/2018
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	Previous inspections documented that the lease road sign located at CR 26 had incorrect operator information and required operator to install sign to comply with Rule 210.e. Signage located at lease road and CR 26 remains uncorrected. Corrective action has not been addressed; corrective action and corrective action date remains applicable. This corrective action and date remains applicable.		
Corrective Action:	Install sign to comply with Rule 210.e.		Date: 10/10/2016
Type	TANK LABELS/PLACARDS		
Comment:	Previous inspections documented incomplete signage on the three (3) tanks at the battery without any signage, and required operator to install signage to comply with Rule 210.d. Signage remains incomplete and corrective action has not been addressed; corrective action and corrective action date remains applicable.		
Corrective Action:	Install sign to comply with Rule 210.d.		Date: 10/10/2016
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>
<b>Good Housekeeping:</b>			
Type	STORAGE OF SUPL		
Comment:	Previous inspections documented a pile of gravel on the location and required it to be removed. Gravel and various debris remains on and throughout location. Corrective action has not been addressed; corrective action and corrective action date remains applicable.		
Corrective Action:	Comply with Rule 603.f		Date: 10/30/2017
Type	STORAGE OF SUPL		
Comment:	Previous inspections documented unused equipment and various trash debris on the north side of the location and around pump unit and required it to be removed. Unused equipment/trash debris remains. Corrective action has not been addressed; corrective action and corrective action date remains applicable.		
Corrective Action:	Comply with Rule 603.f		Date: 10/30/2017
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
	WELLHEAD		
Comment:	Previous inspections documented stained soil at wellhead and required operator to remove and/or remediate stained soil. Soils at wellhead have not been removed, or remediated. Stained soils can also be found in areas surrounding the well. Corrective action has not been addressed; corrective action and corrective action date remains applicable.		
Corrective Action:	Properly treat or dispose of oily waste in accordance with Rule 907.e. Contact area COGCC EPS		Date: 09/09/2017

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
	3		STEEL AST		38.961470,-103.399640
Comment:	Previous inspections documented that NFPA diamond labeling were missing on tanks. NFPA diamond labels remain missing from tanks. See Signs/Markers for corrective action				
Corrective Action:					Date:

**Paint**

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

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Previous inspections documented insufficient and inadequate berms around the tanks, that the berm on the northwest end of the tanks has not been installed. Berms or other secondary containment devices remain inadequate and missing. Corrective action has not been addressed; corrective action and corrective action date remains applicable.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 906.d(1).			
				Date: 09/09/2016

**Venting:**

Yes/No	
Comment:	
Corrective Action:	Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities									
Facility ID:	433121	Type:	WELL	API Number:	073-06540	Status:	PR	Insp. Status:	RI

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**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment [Erosion degradation and stained soils. See stormwater and spills.](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment [Previous inspections documented that that a fence has been constructed across the access road \(coordinates 38.94974 / -103.39839\), forcing vehicle traffic off the road to utilize a gap in the corner of the fence to the east. Operator has failed to construct a gate, and minimize surface disturbance to the constructed access road in accordance with 1002.e\(4\).](#)Corrective Action [Construct gate per corrective actions, comply with 1002.e\(4\) and restrict vehicle travel to the access road and conduct reclamation in accordance with 1000 rules on the disturbed areas where off-road traffic has occurred.](#)

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment [See "Good Housekeeping"](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment [See "Good Housekeeping"](#)

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? Fail Production areas stabilized ? Fail
- 1003c. Compacted areas have been cross ripped? Fail
- 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? Fail
- 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

Previous inspections documented that the production area and location are not stabilized, that areas on the west side of the pad have eroded and degraded. It was also documented that vegetation in the interim areas have not adequately established and required operator to perform additional reclamation in accordance to 1003. Erosion degradation remains evident on the western areas of the pad/location. Large areas of the interim remain bare and exposed soil. In addition compaction concerns have also been identified. Corrective action has not been addressed; corrective action and corrective action date remains applicable.

## Corrective Action

Perform reclamation in accordance to COGCC 1003 series rules including, but not limited to, re-contouring and repairing eroded areas of the pad and location, compaction alleviation and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this location.

Date 10/27/2017

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND

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 \_\_\_\_\_

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
	Fail		Fail		Fail	

Comment: Previous inspections documented erosion concerns to the southwest end of the wellhead and required erosion to be repaired, and stormwater and sediment control BMPs installed or repaired. Areas of erosion appears to have continued to worsen with further erosion encroachment onto the interim reclamation areas. Location remains unstabilized. In addition, the berm along the perimeter of the location has not been maintained and not in proper functioning condition; berm should have been reclaimed during interim reclamation. Corrective action has not been addressed; corrective action and corrective action date remains applicable.

Corrective Action: **Install or repair required BMPs per Rule 1002.f.**

Date: 09/09/2016

Pits: ☐ 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
402146517	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910897">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910897</a>
696200597	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910890">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4910890</a>