

**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:

07/08/2020

Submitted Date:

07/10/2020

Document Number:

696201480

FIELD INSPECTION FORM

Loc ID 312408 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

Status Summary:

THIS IS A FOLLOW UP INSPECTION

FOLLOW UP INSPECTION REQUIRED

NO FOLLOW UP INSPECTION REQUIRED

Findings:

8 Number of Comments

3 Number of Corrective Actions

Corrective Action Response Requested

Operator Information:

OGCC Operator Number: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

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
,		COGCC.inspections@caerus oilandgas.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221515	WELL	PA	08/12/2008	OW	077-08116	ACCO-WOOD ET AL 1-32	RI
312408	LOCATION	CL			-	ACCO-WOOD ET AL-610S96W 32SESE	RI

General Comment:

On 7/8/2020, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Caerus Piceance's ACCO-Wood Et Al 1-32 location in Mesa County, Colorado.

This inspection in response to a 1001.c, 502.b reclamation variance request: Operator submitted doc. #402378934 on 4/30/2020 requesting that ~0.8 miles of access road be left un-reclaimed, and that partial contouring of the pad is conducted per the request of the surface owner. This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the "1001.c: Reclamation Variances and Waivers" operator guidance document. Please refer to the guidance document for additional details.

Please note:
The submission of a variance request does not guarantee approval. The COGCC will provide notice to Operator once an official decision has been made. All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation. Approval of a variance does not absolve the operator from possible enforcement due to past non-compliance with reclamation rules for the subject location.

It was observed in this inspection that final reclamation of the Location is not progressing towards 1004 standards. Signage remaining on the Location with incorrect Operator information; Signage should either be updated or removed from Location. Noxious weeds observed on Location.

Refer to the "Location" and "Reclamation" sections of this inspection report for additional details.

Refer to the photo-documentation 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

Overall Good:

Emergency Contact Number:

Comment: It was observed in this inspection that a sign remains at the Location entrance with incorrect Operator information. Signage will need to be removed for final reclamation to be passed and therefore is no longer needed on the Location. If Operator wishes to keep signage on the Location, it will need to be updated with the correct Operator information.

Corrective Action: Update sign information to comply with 210 Rules, or remove from Location pursuant to 1004 rules.

Date: 07/27/2020

Good Housekeeping:

Type WEEDS

Comment: 1004.e Noxious weed issues are being addressed in the "Good Housekeeping" section to allow Operator the opportunity to address CA within a resolution form.

Field Bindweed (*Convolvulus arvensis*) was observed established on both the Location and access road. This is a Colorado State listed noxious weed.

Corrective Action: Comply with Rule 1004.e and conduct noxious weed management. Ongoing weed management is required until Location receives a passing final reclamation inspection.

Date: 07/27/2020

Overall Good:

Spills:

Type	Area	Volume

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type LOCATION

Comment: Perimeter fence appears to be in proper functioning condition. Once site has achieved reclamation standards and is ready for final passing, fence will need to be removed.

Corrective Action:

Date:

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 221515 Type: WELL API Number: 077-08116 Status: PA Insp. Status: RI

Facility ID: 312408 Type: LOCATION API Number: - Status: CL Insp. Status: RI

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? _____

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 _____ 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% **Fail** Cropland: perennial forage _____

Weeds present **Fail** 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 **11/15/2020**

Comply with 1004 rules; Remove equipment and conduct additional reclamation/revegetation activities; Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage the reclamation until Final Reclamation has passed.

The optimum seeding window for the 2020 spring growing season has passed, therefore, a corrective action date of 11/15/2020 is being provided to allow Operator the opportunity to utilize more favorable seeding windows/conditions prior to the onset of winter.

Overall Final Reclamation **Fail** 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

Comment:

Corrective Action:

Date: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>RECLAMATION COMMENT</p> <p>Operator submitted a 502.b SOVR to waive reclamation requirements of the oil and gas access road and that partial contouring of the pad is conducted. Records show well was plugged 8/12/2008. Per 1004 rules, final reclamation activities were required to be completed by 8/12/2009; It is noted that the variance request is being submitted almost 11 years after reclamation was required per rules</p> <p>At least 11 growing seasons have passed. It was observed in this inspection that the reclamation of the Location is not progressing towards 1004 final reclamation standards; Large areas of the Location is predominantly vegetated by undesirable weedy plant species, weeds deemed to be noxious, or is bare soil and not reflective of the reference area. Cattle panels and a fire ring were observed on the Location; Area appears to be in use and the added disturbances may be hindering the reclamation/revegetation of the Location; the 502.b Surface Owner Variance Request submitted is only requesting a variance to waive reclamation requirements of the access road, and does not include the Pad/Location. Location remains subject to 1004 Rules and requirements including, but not limited to, removal of equipment and revegetating.</p>	trujilloam	07/10/2020

Attached Documents

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

Document Num	Description	URL
402441674	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194472
696201481	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194466