

**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:

08/05/2020

Submitted Date:

08/07/2020

Document Number:

690900114

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: FISCHER, ALEX On-Site Inspection 2A Doc Num: _____

Status Summary:

THIS IS A FOLLOW UP INSPECTION

FOLLOW UP INSPECTION REQUIRED

NO FOLLOW UP INSPECTION REQUIRED

Findings:

9 Number of Comments

6 Number of Corrective Actions

Corrective Action Response Requested

Operator Information:

OGCC Operator Number: 100322

Name of Operator: NOBLE ENERGY INC

Address: 1001 NOBLE ENERGY WAY

City: HOUSTON State: TX Zip: 77070

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
		coltan.berg@nblenergy.com	
Graber, Nikki		nikki.graber@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	
Evans, Jacob	303-328-5605	jacob.evans@nblenergy.com	Noble Environmental
		Trena.Hallback@nblenergy.com	

General Comment:

On August 5, 2020 COGCC Environmental Supervisor (Alex Fischer) and COGCC Reclamation Specialist (Chris Binschus) conducted a joint field inspection of Nobel Energy's Centralized Land treatment Facility, Facility ID 287848. Weather was partially overcast (hazy) temperatures about low to mid 70 degrees Fahrenheit. See Inspection Doc # 697501850 for additional details and corrective actions (CAs).

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	OTHER		
Comment:	Inaccurate Operator signs were observed. Refer to the attached inspection photos		
Corrective Action:	Install/remove signs to comply with Rule 210.c.		Date: <u>09/29/2020</u>
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	Liner material, felt, trash, and debris throughout the entire facility.		
Corrective Action:	Comply with Rule 603.f .		Date: <u>08/21/2020</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	OTHER		
Comment:	Entrance gate was open and not secured, an approximate 20' portion of the western perimeter fence has a breach and an open gate entry which is not controlling public access. Per Rule 908.b.(5)C., the facility shall be designed to control public access, prevent unauthorized vehicular traffic, provide for site security both during and after operating hours, and prevent illegal dumping of wastes. Appropriate measures shall also be implemented to prevent access to the centralized facility by wildlife or domestic animals		
Corrective Action:	Comply with Rule 908.b.(5)C		Date: <u>08/20/2020</u>
Equipment:			
Type: Other	#		corrective date
Comment:	Site is being used to store culverts, cattle guards, fence panels, jersey barricades, and well head protection cages.		
Corrective Action:	Comply with Rule 603.f .		Date: <u>11/06/2020</u>
Venting:			
Yes/No			
Comment:			
Corrective Action:			Date: _____
Flaring:			
Type			
Comment:			

Corrective Action:

Date:

Environmental

Spills/Releases:

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

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate		
Comment	While on Location three (3) truck loads of material (dirt) were brought in and dumped. Upon close examination of the material being dumped, there appeared to be a small amount of discolored soil that had strong hydrocarbon (HC) odors. A truck driver stated that the material was from a project at intersection of CR 39 and CR40. Upon arrival at the intersection of CR 39 and CR40, 4X had a front end loader placing excavated material into dumps trucks. There was an approximate 50' by 50' by 18-20" deep excavation with an approximate 20' by 30' area with discolored soil that had strong HC odors. This is in the area of Off-Location Flowline ID: 462542.			
Corrective Action	Comply with Rule 907.e.			Date: 08/22/2020

Spill/Remediation:

Comment: _____
 Corrective Action: _____ Date: _____

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: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

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% _____ 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
<p>Comment: Unmanaged stormwater run-on was observed at the main point of access to the facility and unmanaged stormwater run-off was observed along the southern facility on to the adjacent property.</p> <p>Corrective Action: Comply with Rule 908.b.(5)E and Rule 1002.f.(2)C</p>						Date: 09/03/2020
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments		
Comment	User	Date
Operator was contacted via email on 8/5/2020.	fischera	08/07/2020
Operator (Jacob Evans) contacted Alex Fischer and Nikki Graber on 8/6/2020 who both met six (6) Noble Energy representatives and one (1) Eagle Environmental representative at the CE&P Facility to discuss past and present operations. It is the COGCCs understanding, that Noble has not used the facility as a CE&P Facility since they acquired the assets from PetroCanada and that they are currently using the facility as a staging area for equipment and non-E&P waste impacted material from various reclamation and other projects.		
Observed throughout the soil mounds were fabric and liner pieces.		
There were several piles of pea gravel typically seen in tank batteries near the NE corner of the facility and in the center of the facility. Samples of the of pea gravel were collected by Noble's consultant for laboratory analyses.		
Six (6) monitoring wells (MW) and a one-inch PVC riser were observed. One of the monitoring wells was damaged during. The damaged MW and the one-inch PCV stickup shall be abandoned in accordance to the State Engineers Office (SEO), Department of water Resources (DWR) guidelines. All documentation shall be provide to the COGCC as part of the annual report.		
Near the storm water detention pond, there appeared to be wildlife tracks.		
In the SE corner of the facility, culverts, cattle guards, fence panels, jersey barricades, and well head protection cages are stored.		
There was large soil/material mound with felt pieces encompassing almost the entire norther half of the facility leaving room for vehicle access.		
There was a large soil/material mound encompassing the SE corner of the facility, with the exception of where the equipment was being stored.		
The following was a CA from the October 10, 2017 Inspection, Doc # 690900004 that have yet to be complied with. Per Rule 908.g.(2) submit an eForm 27 at a minimum including the following: Brief history of the Facility and Operation, compilation of data supporting the closure (ie. history of confirmation samples of Treatment Cells #1 through #5, disposition of the remediated soil stockpiles), compilation of data supporting the plugging and abandonment of the 6 monitoring wells, sampling of fluids from the storm water detention pond for Table 910-1 constituents, soil sampling of the material near the area where surface water runoff (north side) may enter the stormwater detention pond, sampling of material beneath the line of the storm water detention pond, and compilation of data supporting compliance with the Weld County "Approved Site Specific Development Plan" and the Use by Special Review Permit Number 1517 (SRP-1517) and Applicable Weld County Code.		

Document Number 690900004 be referenced on the eForm 27.
 Per Rule submit an eForm 4 providing a 502.b. variance request for interim and final reclamation. This should include data supporting compliance with the Weld County "Approved Site Specific Development Plan" and the Use by Special Review Permit Number 1517 (SRP-1517) and applicable Weld County Code for the current and future use of the Location.

Regarding additional reclamation requirements, contact:
 Binschus, Chris - Area (144) Reclamation Inspector
 chris.binschus@state.co.us
 (970) 352-9196
 (970) 702-3003 (cell)

Noble shall consult with the appropriated COGCC Staff (Environmental, Reclamation, and OGLA) and Weld County, to determine the process from change of use of a CE&P facility to an equipment and materials storage yard. This process shall begin within the next 30-days of the submission of this inspection.

Additionally, Noble shall provide the mass balance of materials being received at the CE&P facility and those materials leaving the CE&P facility including the source(s) of materials and final placement of disposition of the materials. This shall be captured in the annual report.

Attached Documents

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

Document Num	Description	URL
402462316	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5219616
690900115	CE and P Facility ID 287848 20200805 Photo	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5219605