

**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:

09/18/2020

Submitted Date:

10/01/2020

Document Number:

697502028

FIELD INSPECTION FORMLoc ID 336167 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**

OGCC Operator Number: 47120

Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP

Address: P O BOX 173779

City: DENVER State: CO Zip: 80217-

Status Summary:

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

Findings:

7 Number of Comments

1 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
Pesicka, Conor		conor.pesicka@state.co.us	
		poolsteven@hrodlaw.com	
		Kate_Graves@oxy.com	
,		COGCCinspections@anadarko.com	All inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
336167	LOCATION	AC			-	DOUTHIT TANK BATTERY 32-26HZ	RI

General Comment:

This is a follow up desktop inspection in response to a reclamation complaint. COGCC staff submitted a corrective action inspection on 9/23/2020 (Field Inspection Report (FIR) Doc. #697502017). In response to the FIR, the complainant had concerns about COGCC's assessment on access roads. After COGCC staff conducting further review, COGCC made changes to the reclamation requirements for access roads- Refer to Photo #1 and COGCC Comments for additional information.

This inspection is being entered for notification and documentation only and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c.

Inspected FacilitiesFacility ID: 336167 Type: LOCATION API Number: - Status: AC Insp. Status: RI**Complaint**

Comment: [Complaint #: 200449186](#)
[Field Inspector Assigned: Chris Binschus](#)
[Location ID#: 336167](#)
[Inspection Document #'s: 697502017 and 697502028](#)
[Nature of complaint: Complainant had concerns about crop growth and access roads.](#)

Corrective Action:

Date:

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

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: IRRIGATED

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: IRRIGATED _____

Reminder: _____

Comment: _____

Well plugged Pass Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded Fail Contoured Fail Culverts removed _____

Gravel removed Fail

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

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage Fail

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:	<p>This location does not comply with Rule 1004. The location mostly lacks crop growth. Gravel was observed throughout portions of the location, which indicates not all gravel was properly removed. Refer to Photos 16-18.</p> <p>Operator has failed to reclaim a portion of an access road that was not pre-existing and has failed to remove gravel from a portion of a pre-existing road. Refer to Photo 1 and COGCC Comments for additional information.</p>	Date _____
	<p>Comply with Rule 1004 to perform additional reclamation activities related to failed crop growth, reclaim portions of the access road that were not pre-existing and remove gravel from portions of the access road that were pre-existing.</p> <p>This might be referred to Enforcement; therefore, there is no corrective action date. Operator should conduct the corrective action as soon as possible. Collaborate with the landowner to determine mitigating measures that will allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production.</p>	
Overall Final Reclamation Fail Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: At the time of this inspection, no erosion issues were observed.

Corrective Action: _____ Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>Note: COGCC staff now changed the reclamation requirements to include the removal of gravel from pre-existing roads that were built prior to the commencement of oil and gas activity. It is believed these access roads built prior to oil and gas activity did not have gravel and that gravel was imported to improve access and oil and gas operations. Per Reclamation Rules, the surface of the land shall be restored as nearly as practicable to its condition at the commencement of drilling operations.</p> <p>Also, COGCC staff removed the orange circle from Photo #1 for Location #4 because technically there were no observed reclamation issues and there were no corrective actions assigned to that location.</p>	binschusc	10/01/2020
<p>Note: The attached photo document also has other locations related to Complaint #200449186.</p>	binschusc	10/01/2020

Attached Documents

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

Document Num	Description	URL
402502064	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5261015
697502032	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5261010