

**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:

11/19/2020

Submitted Date:

11/23/2020

Document Number:

696202027**FIELD INSPECTION FORM**Loc ID 414132 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 77330Name of Operator: SG INTERESTS I LTDAddress: 100 WAUGH DR SUITE 400City: HOUSTON State: TX Zip: 77007**Status Summary:**

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

Findings:5 Number of Comments2 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
,		inspection@sginterests.com	All Inspections
De Paolo, Corey		corey.depaolo@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
414132	LOCATION	AC			-	Cow Skull 11-89-18 1	RI

General Comment:

On 11/19/2020, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at SG Interests' Cow Skull 11-89-18-1 location in Gunnison County, Colorado.

This inspection is a followup to inspection #696201334, and #696201673 to document compliance with the following corrective actions: 1002.f.(2)C: Stormwater

This inspection is also in response for Resolution Form #402513704 stating corrective actions have been addressed

Refer to the "Reclamation" and "Stormwater" section of this inspection report for additional details.

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.

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

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

Land Use: IMPROVED PASTURE, IRRIGATED, OTHER

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? Fail Production areas stabilized ? _____

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? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 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

Operator previously received an approved 502.b delayed operations interim reclamation waiver (Doc. #401721595). Sundry expired 2/5/2020 and reclamation was required. FIR #696201334 observed that interim reclamation appeared to have been conducted; after additional review of aerial imagery and observations of the Location it has been determined that this was incorrect.

Though work had been conducted on the western areas of the Location, reclamation of areas not needed for production on the Location has NOT been conducted pursuant to 1003 requirements, and per Form 4 #401721595 COAs.

Corrective Action

Comply with COGCC 1003 rules and conduct interim reclamation. 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 soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. A CA date of 2/5/2020 is being applied since this is the expiration of the interim reclamation delayed variance doc. #401721595.

Date 02/05/2020

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: IMPROVED PASTURE, IRRIGATED

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

Comment: Inspection #696201334 and #696201673 observed insufficient or missing stormwater and erosion control BMPs on the Location in accordance with Rule 1002.f.

It was observed in this inspection that a sediment trap and perimeter ditch has not been constructed in accordance with good engineering practices for the sites conditions; slopes on location exposed soils- erosion/stabilization BMPs not installed on slopes.

Corrective Action: Install or repair required BMPs in accordance with Rule 1002.f and good engineering practices; Maintain BMPs in proper functioning condition; Continue stormwater management until Location receives a passing final reclamation inspection, pursuant to Rule 1002.f.

Interim reclamation due on the Location. Temporary stabilization controls will be required on areas to be interim reclaimed; Long term stabilization BMPs will be required on all areas not interim reclaimed.

Date: 06/13/2020

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
Inspection #699801398 observed an unused pump jack on the Location and required Operator to comply with the following corrective action by 10/8/2020: "Production facilities, shall be kept free of equipment and supplies not necessary for use on that lease. Remove all unused equipment from location."	trujilloam	11/20/2020
Unused equipment appears to have been removed; Inspector requiring corrective action is being included within this report for notification.		

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

Document Num	Description	URL
402538715	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296739
696202045	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296734