

FORM
INSPRev
X/15State of Colorado
Oil and Gas Conservation Commission1120 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:

696202037

FIELD INSPECTION FORM

 Loc ID 428197 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

Operator Information:
 OGCC Operator Number: 77330
 Name of Operator: SG INTERESTS I LTD
 Address: 100 WAUGH DR SUITE 400
 City: HOUSTON State: TX Zip: 77007
Findings:

- 6 Number of Comments
- 2 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

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428196	WELL	PR	05/01/2018	SI	051-06107	ECK 12-90-1 1	RI
428197	LOCATION	AC			-	Eck 12-90-1 428197	RI

General Comment:

On 11/19/2020, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at SG interests Eck 12-90-1 428197 location in Gunnison County, Colorado.

The following compliance issues were observed during this inspection:

- 1002.f(2)C: Erosion controls
- 1002.f/900: Accumulations of fluids within cellar, protection of wildlife resources.
- 1003.f: Noxious weeds

Refer to the "Reclamation" and "Stormwater" sections 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.

Inspected Facilities

Facility ID: 428196 Type: WELL API Number: 051-06107 Status: PR Insp. Status: RI

Producing Well

Comment: [PR Well, Interim Reclamation and Stormwater inspection.](#)

Corrective Action:

Date:

Facility ID: 428197 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: OTHER, RANGELAND

Comment: Operator has received a 502.b NTO Interim Reclamation Procedures for Delayed Operations variance (Doc. #401293481). Interim reclamation delayed for up to 5 years and required no later than 5/31/2022 per the signed surface owner document.

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 **12/07/2020**

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? _____ F _____

Comment Noxious weeds observed on the northern slopes of the Location. Due to the onset of winter conditions and plant dormancy, a followup inspection will need to be conducted in the 2021 growing season to determine compliance with Rule 1003.f.

It was also observed in this inspection that the cellar at the well head has filled with fluids/chemicals and BMPs to protect wildlife resources are insufficient.

Corrective Action Comply with Rule 1002.f and remove fluids/chemicals within containment. Install BMPs at cellar to protect wildlife resources.

Date 12/04/2020

Overall Interim Reclamation

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
Blankets	Fail					

Comment: A COA from doc. #401628036 required Operator to implement temporary stabilization measures on the cut-slopes of the Location, with long term erosion controls installed by 5/30/2018. Operator submitted FIRR #401461789 stating "jute matting to address the long term COA requirement". No additional BMPs appear to have been implemented in conjunction with the matting

It was observed in this inspection that the erosion control blankit is insufficient as a long-term control, and has not been maintained in proper functioning condition; no long term vegetation is establishing.

Corrective Action: **Comply with Rule 1002.f: Implement long-term erosion control BMPs in accordance with good engineering practice and maintain in proper functioning condition.**

Date: 12/23/2020

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
402538716	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296740
696202047	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5296735