

**FORM
INSP**Rev
X/20**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:

06/15/2021

Submitted Date:

06/17/2021

Document Number:

696202832**FIELD INSPECTION FORM**Loc ID 428197 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:6 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
,	970-385-0696	inspection@sginterests.com	All Inspections
Pesicka, Conor		conor.pesicka@state.co.us	
,		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428197	LOCATION	AC			-	Eck 12-90-1 428197	RI

General Comment:

On 6/15/2021, Reclamation Specialist Trujillo conducted an interim reclamation and storm water inspection at SG Interests' Eck 12-90-1 1 location in Gunnison County, Colorado.

This inspection is a followup to #696202037 dated 11/19/2020 to document compliance with the following corrective actions:

-Comply with Rule 1002.f.(2)C by 12/23/2020

-Comply with Rules 1002.f and 902.b by 12/4/2020

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

Refer to the "Equipment" 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 inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

corrective date

Type: Other

1

Comment:

Inspection #696202037 observed that the cellar at the well head has filled with fluids/chemicals, and that BMPs to prevent access by, and impact to, wildlife resources were inadequate. Inspection required Operator to comply with Rule 1002.f and remove fluids/chemicals within containment, and to install BMPs at the cellar to protect wildlife resources.

It was observed in this inspection fluids/chemicals have not been removed from the cellar, and BMPs to protect wildlife resources remain missing or inadequate; wildlife mortality observed within the cellar.

Operator failed to take proactive measures to minimize adverse impacts to wildlife resources.

Corrective Action:

Original corrective action and date remains applicable:

Date: 12/04/2020

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

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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. Signage observed at tank facility.](#)

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: 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

Comment: [See "COGCC Comments" for comments regarding stormwater.](#)

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

COGCC Comments

Comment	User	Date
<p>STORMWATER</p> <p>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".</p> <p>Inspection #696202037 observed that the erosion control blanket was insufficient as a long-term control, and that BMP was not in proper functioning condition; long term vegetative establishment not occurring on cut-slopes. Inspection required Operator to Comply with Rule 1002.f by 12/23/2020, and implement long-term erosion control BMPs in accordance with good engineering practice and maintain in proper functioning condition.</p> <p>It was observed in this inspection that control measures to protect and stabilize the cut-slopes of the Location, until long term stabilization has been achieved, remain missing or insufficient.</p> <p>Corrective action and conditions have not been addressed and remain applicable.</p>	trujilloam	06/17/2021

Attached Documents

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

Document Num	Description	URL
696202833	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5458334