

**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:

06/25/2021

Submitted Date:

06/29/2021

Document Number:

696202866**FIELD INSPECTION FORM**Loc ID 335573 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10456Name of Operator: CAERUS PICEANCE LLCAddress: 1001 17TH STREET #1600City: DENVER State: CO Zip: 80202**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
, "		COGCC.inspections@caerus oilandgas.com	All Inspections
Arthur, Denise		denise.arthur@state.co.us	
Arauza, Steven		steven.arauza@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335573	LOCATION	AC			-	N. Parachute EF G29 595	RI

General Comment:

On 6/25/2021 , Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Caerus Piceances' N. Parachute EF G29 595 Location in Garfield County, Colorado.

This inspection is a followup to #696202456 and #698100232 to document compliance for the following corrective actions:
-1003: Interim reclamation

Below is a summary of this inspection report:

-Records show 6/30/2011 as the "date of 1st production"; interim reclamation was required by 12/30/2011; Doc. #401121866 (9/30/2016) stated that the Location would be interim-reclaimed in 2016.

-Reclamation Inspection #696202456 (3/9/2021) documented that the Location is out of compliance with COGCC 1003 Rules; open pits with cuttings observed on the southeast end of the Location. Inspection required Operator to comply with 1003 Rules by 12/31/2016.

-Environmental inspection #698100232 (3/31/2021) required Operator to submit a Form 27 with information including documentation and demonstration of compliance with the 1/5/2017 COGCC NTO for Interim Reclamation Procedures for Delayed Operations (including cost estimates for removal, transport and disposal in addition to the cost to perform interim reclamation).

-It was observed in this inspection that the Location remains out of compliance with COGCC 1000 series rules, and corrective actions; Interim reclamation of the Location has not been performed; open pits with cuttings remain on the southwest end of the Location; Operator submitted Form 27(I) #402645103 on 3/31/2021, however Operator failed to include documentation and demonstration of compliance with the 1/5/2017 COGCC NTO for Interim Reclamation Procedures for Delayed Operations (including estimates for removal, transport and disposal in addition to the cost to perform interim reclamation) attached to the Form 27 per the corrective action.

This Location remains out of compliance with COGCC Rules and Corrective actions.

Refer to the "Reclamation" and "Environmental" sections of this inspection report for additional details.

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.

Environmental**Spill/Remediation:**

Comment: Environmental inspection required Operator to Submit a Form 27 that includes the following information by 7/01/2017:

- 1) a comprehensive project summary including total cuttings volume and cuttings management cell construction information
- 2) remediation workplan with implementation schedule and anticipated completion date
- 3) comprehensive analytical summary table comparing cuttings samples collected to date to the complete Table 915-1 list using the Protection of Groundwater Screening Level Concentrations
- 4) documentation and demonstration of compliance with the 1/5/2017 COGCC NTO for Interim Reclamation Procedures for Delayed Operations, this would include estimates for removal, transport and disposal in addition to the cost to perform interim reclamation.
- 5) information required by Rule 915.b if the Operator intends to request to utilize cuttings with exceedances for EC, SAR, pH, and/or boron for interim reclamation.

Operator submitted F27 #402645103 on 03/31/2021; however, Operator did not submit the required documentation and demonstration of compliance with the 1/5/2017 COGCC NTO, as well as the cost estimates required by the corrective action; no variance has been approved for this Location.

This portion of the corrective action remains applicable.

Corrective Action: Submit documentation and demonstration of compliance with the 1/5/2017 COGCC NTO for Interim Reclamation Procedures for Delayed Operations, this would include estimates for removal, transport and disposal in addition to the cost to perform interim reclamation.

Operator shall submit the required documentation attached to a Form 4 to NW EPS Arauza, and NW Reclamation Specialist Trujillo.

Date: 07/01/2017

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: RANGELAND

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? _____

1003d. Drilling pit closed? Fail 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? Fail

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 Fail

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

Reclamation Inspection #696202456 (3/9/2021) documented that the Location is out of compliance with COGCC 1003 Rules; open pits with cuttings observed on the southeast end of the Location. Inspection required Operator to comply with 1003 Rules by 12/31/2016.

It was observed in this inspection that the Location remains out of compliance with COGCC 1000 series rules, and corrective actions; Interim reclamation of the Location has not been performed, and no Interim Reclamation Procedures for Delayed Operations variance request has been approved.

This Location will remain out of compliance with COGCC Reclamation Rules until a variance has been approved, or interim reclamation has been completed per 1003 Rules and corrective actions.

Corrective Action

Comply with COGCC 1003 Rules and conduct interim reclamation; ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. Doc. #40112186 states Location would be reclaimed in 2016, therefore a corrective action date of 12/31/2016 is being provided.

Date 12/31/2016

Overall Interim Reclamation Fail

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 ☐**COGCC Comments**

Comment	User	Date
<p>COAs per F27 #402645103 required:</p> <p>- The Operator shall address potential pathways to groundwater and surface water on a Supplemental eForm 27 in order to determine whether Table 915-1 Residential Soil Screening or Protection of Groundwater Soil Screening Concentration Levels will apply.</p> <p>-The attached report (doc #402645190) recommends that the Operator "implement a phased approach to this project and re-sample/investigate when project becomes a higher priority..." Submit a proposed implementation schedule via a Supplemental eForm 27.</p> <p>-Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the complete Table 915-1 list and shall delineate the extent of impacts using the Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.</p> <p>-Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the complete Table 915-1 list and shall delineate the extent of impacts using the Table 915-1 Protection of Groundwater Soil Screening Level Concentrations.</p> <p>- Operator shall collect sample(s) from comparable, nearby non-impacted native soil for purposes of establishing background soil conditions including pH, electrical conductivity (EC) and sodium adsorption ratio (SAR), per Rule 915.e.(2).D.</p> <p>Unable to find documentation, or a supplemental Form 27, showing Operator complied with F27 Conditions; this issue is being forwarded to Environmental</p>	trujilloam	06/29/2021

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

Document Num	Description	URL
402732753	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5466761
696202868	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5466758