

**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:

10/08/2021

Submitted Date:

10/12/2021

Document Number:

697503330

FIELD INSPECTION FORMLoc ID 465272 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10656

Name of Operator: MORNING GUN EXPLORATION LLC

Address: 1601 ARAPAHOE ST

City: DENVER State: CO Zip: 80202

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

9 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
		jdunn@morninggun.com	
		pflatley@morninggun.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
465272	LOCATION	AC			-	Castor 7-59 12	CI

General Comment:

This is a Construction and Stormwater Inspection in response to Form 42: Notice of construction- Document # 402795530.

Location Construction

Location ID: 465272 CDP: _____

Comment: A disturbance area of 10.94 acres was mapped using drone technology; this appears to be in compliance with the approved Form 2A for the permitted disturbance area.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: Per Rule 406.c. (effective 1/15/2021), a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim reclamation.

COGCC Staff, Chris Binschus, signed in at the main building and did not see any posted Form 2A on location.

Corrective Action: Comply with Rule 406.c.

Date: 10/08/2021

The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.

On Site Inspection (305):Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

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 _____ Fail _____

Comment This location does not comply with Rule 1002.b. Per Rule 1002.b.(2), Operator shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper.

Based on the total salvageable area of 7.4 acres, the Operator only salvaged approximately three (3) inches (stockpiled ~3350 cubic yards). Based on a desktop review for Map Units 44 and 45, the A horizon is ~ five (5) inches and it appears the salvageable topsoil is ~ sixteen (16) inches in depth.

Corrective Action Comply with Rule 1002.b.(2) corrective actions set forth in the COGCC Comments sections.

Date 12/10/2021

1002c. PROTECTION OF SOILS _____ In Process _____

Comment Topsoil has been temporarily stabilized with equipment tracking for short-term stabilization. Operator shall implement long-term stabilization BMPs (i.e., seeding when appropriate) when stabilizing all stockpiles to ensure compliance under Rule 1002.c.

Per Rule 1002.c., all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Per Rule 1002.c., BMPs to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment Per Rule 1002.e.(1), Operator shall adequately construct and stabilize the entire well pad area, including cut and fill slopes, to control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination.

The well pad area has not been stabilized and wind erosion is evident just after ~one month since the commencement of construction activities, as it has started to fill in stormwater BMPs.

Corrective Action Comply with Rule 1002.e. to stabilize the well pad area.

Date 12/10/2021

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 <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: Operator has installed stormwater and erosion control BMPs during the construction phase of the location in accordance with good engineering practices. A ditch and berm BMP has been installed around the entire perimeter of location, which are directed to two (2) sediment traps. The northeast sediment trap= ~75'x 75' and the southeast sediment trap ~60'x60' both with stabilized outlets. Refer to the COGCC Comments section for additional stormwater compliance information.

Culvert at the entrance of CR121 needs maintenance, as it is partially blocked with gravel.

Corrective Action: _____ Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices.	binschusc	10/11/2021
<p>Rule 1002.b.(2) corrective actions:</p> <p>Operator shall conduct a topsoil analysis, using adjacent reference areas, to estimate topsoil depth. Operator shall report where topsoil samples were taken by overlaying sample points onto aerial imagery. Operator shall include photos of the soil samples. Discrete soil samples shall be taken and reported at 6" intervals to a minimum depth of 18".</p> <p>Operator shall report the following soil chemical and physical properties from each sample including, at a minimum: depth, pH Saturated Paste, electrical conductivity, organic matter (Walkely-Black method), nitrate nitrogen (AD-DTPA), phosphorus (AD-DTPA), potassium (AD-DTPA), zinc (AD-DTPA), iron (AD-DTPA), manganese (AD-DTPA), copper (AD-DTPA), lime, percent calcium carbonate equivalency (gravimetric), SAR, and texture estimates (hydrometer with textures reported as USDA).</p> <p>Operator shall conduct the topsoil analysis before frozen soil conditions.</p> <p>Operator shall submit the topsoil analysis using the required Field Inspection Report Resolution form and attach any relevant or supporting documents.</p>	binschusc	10/11/2021

Attached Documents

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

Document Num	Description	URL
402838425	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5552399

697503331	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5552398
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