

**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:

01/09/2023

Submitted Date:

01/17/2023

Document Number:

696105675

FIELD INSPECTION FORMLoc ID 482780 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 81490

Name of Operator: ST CROIX OPERATING INC

Address: P O BOX 13799

City: DENVER State: CO Zip: 80201

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

5 Number of Comments

3 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
Melnychenko, Paul	(303) 489-9298	stcroixexp@aol.com	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482780	LOCATION	AC			-	Horseshoe 1	RI
483051	WELL	DG	12/12/2022		121-11098	Horseshoe 1	RI

General Comment:

This is a Final Reclamation and Stormwater Inspection for PA Well API#121-11098.

Inspected Facilities									
Facility ID:	<u>482780</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>	
Facility ID:	<u>483051</u>	Type:	<u>WELL</u>	API Number:	<u>121-11098</u>	Status:	<u>DG</u>	Insp. Status:	<u>RI</u>

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

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

Land Use: IRRIGATED

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____ Fail _____

Comment _____

The Operator stated in their Topsoil Protection Plan (Doc #402948673) that a total of 3,148 cubic yards would be salvaged from the location in the disturbance area of 5.83 acres. Based on field observation and desktop review, it appears the Operator only salvaged approximately 4" of topsoil (3148 cubic yards /253945.80 ft^2)*27= 0.33ft or 4.02in; where the topsoil for this area is approximately 12" (Soil Type 70-Valent sand; A and AC horizon) and should have been approximately 9396 cubic yards of topsoil salvaged. Refer to attached inspection photos for additional information.

Corrective Action _____

Operator shall submit results from soil pits and proposed soil sample sites as described in Topsoil sampling map (Doc #402948673; page 6) to determine and evaluate topsoil depths as measured in the field. Additionally, Operator shall provide documentation for the quantity/volume of all topsoil salvaged during the construction phase of this location to ensure compliance with topsoil salvage requirements.

Date **01/24/2023**

Submittal of this information does not indicate compliance with the topsoil salvage requirement of Rule 1002.b.

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

During this inspection, it was observed that stored topsoil stockpiles did not have any evidence of protections against wind and water erosion. Topsoil stockpiles around the proposed tank battery location, along the access road, and near the well location were comprised of unconsolidated material and were not properly stabilized; no temporarily stabilizations (e.g. equipment tracking) were observed on stockpiles of soil. Refer to attached inspection photos.

Corrective Action _____

Comply with Rule 1002.c. Corrective action date is the date the location was observed out of compliance.

Date **01/09/2023**

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: IRRIGATED _____

Reminder: _____

Comment: _____

Well plugged _____ In _____

Pit mouse/rat holes, cellars backfilled _____ In _____

Debris removed _____

No disturbance /Location never built _____

Access Roads _____ Regraded _____ In _____

Contoured _____ In _____

Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ In _____

Locations, facilities, roads, recontoured _____ In _____

Compaction alleviation _____

Dust and erosion control **Fail** _____

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:	<p>During this inspection, it was observed that the well had been P&A and that portions of the location were in the process of being reclaimed (e.g. topsoil being moved back to its relative position) in anticipation of final reclamation. Operator shall comply with the timing requirements to complete final reclamation activities. Operator shall continue to monitor and manage this site until the location meets Rule 1004 standards, including stormwater and weed management. Operator shall submit a Form 4 Final Reclamation Complete notice when the location meets Rule 1004 standards. COGCC may conduct inspections prior to receiving said notice to ensure compliance with Rule 1004.</p>					
Corrective Action:						Date
Overall Final Reclamation <input type="checkbox"/> In Process <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>						
<u>Storm Water:</u>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment:	<p>This location does not comply with Rule 1002.f. During this inspection no stormwater or erosion control BMPs were observed around the perimeter of the location, or downslope areas on the eastern portion of the location, or around any stored soil stockpiles. Without any BMPs in place, the topsoil is susceptible to wind and water erosion. Operator needs to install sufficient erosion and stormwater control BMPs in accordance with good engineering practices, immediately.</p>					Date: 01/09/2023
Corrective Action:	<p>Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.</p> <p>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.</p>					
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
403293356	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5986591
696105681	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5986589