

**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 FORM**

Loc 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
- 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
		pflatley@morninggun.com	
		jdunn@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.

*(This area is currently blank for additional comments or findings.)*

**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:

\_\_\_\_\_

**Inspected Facilities**

Facility ID: 465272 Type: LOCATION API Number: - Status: AC Insp. Status: CI

**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 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 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? \_\_\_\_\_

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: 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
<p><span style="color: blue;">Rule 1002.b.(2) corrective actions:</span></p> <p><span style="color: blue;">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".</span></p> <p><span style="color: blue;">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).</span></p> <p><span style="color: blue;">Operator shall conduct the topsoil analysis before frozen soil conditions.</span></p> <p><span style="color: blue;">Operator shall submit the topsoil analysis using the required Field Inspection Report Resolution form and attach any relevant or supporting documents.</span></p>	binschusc	10/11/2021
<p><span style="color: blue;">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.</span></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
697503331	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5552398">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5552398</a>