

**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:

06/28/2023

Submitted Date:

06/29/2023

Document Number:

696205067

FIELD INSPECTION FORM

Loc ID 467272	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 26 Number of Comments 12 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: 10456 Name of Operator: CAERUS PICEANCE LLC Address: 1001 17TH STREET #1600 City: DENVER State: CO Zip: 80202				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
,		COGCC.inspections@caerusoilandgas.com	All Inspections
,		dnr_cogccenforcement@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467272	LOCATION	AC			-	ELU J14 FED-496 PAD	RI
467497	WELL	PR	03/07/2022	GW	103-12366	ELU J14 FED 14D-14-496	RI
467498	WELL	PR	02/24/2022	GW	103-12367	ELU J14 FED 13C-14-496	RI
467499	WELL	PR	09/07/2021	GW	103-12368	ELU J14 FED 22B-14-496	RI
467500	WELL	PR	09/20/2021	GW	103-12369	ELU J14 FED 22D-14-496	RI
467501	WELL	PR	03/24/2022	GW	103-12370	ELU J14 FED 15C-14-496	RI
467502	WELL	PR	03/07/2022	GW	103-12371	ELU J14 FED 14B-14-196	RI
467503	WELL	PR	09/20/2021	GW	103-12372	ELU J14 FED 22C-14-496	RI
467504	WELL	PR	03/24/2022	GW	103-12373	ELU J14 FED 15A-14-496	RI
467505	WELL	PR	10/02/2021	GW	103-12374	ELU J14 FED 23B-14-496	RI
467506	WELL	PR	03/08/2022	GW	103-12375	ELU J14 FED 14A-14-496	RI
467507	WELL	PR	10/02/2021	GW	103-12376	ELU J14 FED 12C-14-496	RI
467508	WELL	PR	03/24/2022	GW	103-12377	ELU J14 FED 15D-14-496	RI
467509	WELL	PR	03/07/2022	GW	103-12378	ELU J14 FED 14C-14-496	RI
467510	WELL	PR	09/07/2021	GW	103-12379	ELU J14 FED 11C-14-496	RI
467511	WELL	PR	09/07/2021	GW	103-12380	ELU J14 FED 22A-14-496	RI
467512	WELL	PR	03/01/2022	GW	103-12381	ELU J14 FED 15B-14-496	RI
467513	WELL	PR	06/12/2021	GW	103-12382	ELU J14 FED 21C-14-496	RI
467514	WELL	PR	06/12/2021	GW	103-12383	ELU J14 FED 21B-14-496	RI

467515	WELL	PR	02/24/2022	GW	103-12384	ELU J14 FED 13B-14-496	RI
467516	WELL	PR	02/24/2022	GW	103-12385	ELU J14 FED 13D-14-496	RI
467518	WELL	PR	02/24/2022	GW	103-12387	ELU J14 FED 23C-14-496	RI
467519	WELL	PR	10/02/2021	GW	103-12388	ELU J14 FED 23A-14-496	RI
467520	WELL	PR	02/24/2022	GW	103-12389	ELU J14 FED 13A-14-496	RI
467521	WELL	PR	09/20/2021	GW	103-12390	ELU J14 FED 12A-14-496	RI
467522	WELL	PR	09/07/2021	GW	103-12391	ELU J14 FED 11D-14-496	RI
467523	WELL	PR	09/20/2021	GW	103-12392	ELU J14 FED 12B-14-496	RI
467524	WELL	PR	06/12/2021	GW	103-12393	ELU J14 FED 21D-14-496	RI
467525	WELL	PR	10/02/2021	GW	103-12394	ELU J14 FED 12D-14-496	RI

General Comment:

On 6/28/2023, Reclamation Specialist Trujillo inspected Caerus Piceance LLC's ELU A24-496 Pad Location in Rio Blanco County, Colorado.

This inspection is a followup to #696203714, #696203781, #696203896, #696203994, and NOAV #403207627 to document compliance with the following corrective actions:

- Protection of Soils
- Signage (wells/tanks)
- Stormwater
- Good Housekeeping
- Spills / Spill reporting
- Plugging and abandonment

This inspection is also in response to Resolution No. 403232060 submitted 11/16/2022; Resolution Nos. 403225823, 403225808 submitted 11/10/2022; Resolution Nos. 403224262, #403224212 submitted 11/9/2022; Resolution Nos. 403219652, 403219355 submitted 11/4/2022; Resolution Nos. 403205331 submitted 10/21/2022; and Resolution Nos. 403197219, 403197207 submitted 10/13/2022 stating corrective actions have been completed.

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

The following new compliance issues were observed during this inspection:

- Signage/Labeling
- Storage of unused equipment
- Interim Reclamation
- Stormwater
- Uncovered lines / OOSLAT

Refer to the "Location" and "Reclamation" 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: ☐**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	<p>Previous inspections observed signage/labeling missing from the three (3) tanks at the battery facility. Inspections required Operator to comply with Rule 605.h.</p> <p>It was observed in this inspection that the tanks at the battery have been labeled pursuant to Rule 605.h.</p> <p>This corrective action has been resolved.</p>		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	<p>Previous inspection observed signage missing from wells on the Location. Inspection required Operator to comply with Rule 605.d</p> <p>It was observed in this inspection that signage remains missing from the 22-D and the 23-C wells on the Location. Corrective action remains applicable.</p>		
Corrective Action:	Comply with Rule 605.d	Date:	07/25/2022
Type	TANK LABELS/PLACARDS		
Comment:	<p>Four (4) tanks were observed stored within the containment BMP of the drill cuttings, on the southeast end of the Location.</p> <p>Tanks observed without required labeling. Tanks also appear to be unused, or not necessary for production.</p>		
Corrective Action:	<p>Comply with Rule 605.h.</p> <p>If tanks are unused, or not necessary for production, Operator shall comply with Rule 606.a.</p> <p>The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.</p>	Date:	06/28/2023
Type	BATTERY		
Comment:	<p>Previous inspections observed signage/labeling missing at the tank battery facility on the southwest end of the Location. Inspection required Operator to comply with Rule 605e.</p> <p>It was observed in this inspection that signage remains missing at the tank battery. Corrective action remains applicable.</p>		
Corrective Action:	Comply with Rule 605.e	Date:	07/27/2022
Type	OTHER		
Comment:	Location entrance		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 970-285-2615/911

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
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Comment:	Four (4) tanks were observed stored within the containment BMP of the drill cuttings, on the southeast end of the Location. Tanks observed without required labeling. Tanks also appear to be unused, or not necessary for production.		
Corrective Action:	Comply with Rule 605.h. If tanks are unused, or not necessary for production, Operator shall comply with Rule 606.a. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.		
Type	UNUSED EQUIPMENT		
Comment:	Pipe, and what appears to be a cellar grate/cover observed stored on the southeast end of the Location. Unused pipe observed stored behind separators on the west end of the Location.		
Corrective Action:	Comply with Rule 606.a. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.		
Type	OTHER		
Comment:	Containment BMP observed at the Gas lift equipment has filled with fluids.		
Corrective Action:	Remove and properly dispose fluids. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.		
Type	DEBRIS		
Comment:	Previous inspections observed weed debris accumulation along the perimeter of the Location. Inspections required Operator to comply with Rule 606 and remove debris from the Location and properly dispose. It was observed in this inspection that the weed debris along the perimeter of the Location has been removed. This corrective action has been resolved.		
Corrective Action:			
Type	UNUSED EQUIPMENT		
Comment:	Portable heater unit observed stored next to the wells. Equipment is not necessary for production.		
Corrective Action:	Comply with Rule 606.a. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.		

Overall Good: ☐

Spills:				
Type	Area	Volume		
Comment:	Stained soils observed around areas where the portable heater unit is being stored, around the gas lift equipment currently in use on Location, and separator equipment.			
Corrective Action:	Clean/remediate stained soils on Location to Table 915-1 standards. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.			Date: 06/28/2023

In Containment: No

Comment: Previous inspections observed impacted materials due to drill cuttings spilled outside of containment. Inspections required Operator to document cleanup efforts and provide documentation of the cleanup attached to a Form 4.

Operator submitted Form 4 #403152952 with required documentation.

This CA has been resolved.

☒ Multiple Spills and Releases?

Fencing/:			
Type			
Comment:	Jersey barriers around wells and separator equipment.		
Corrective Action:		Date:	

Equipment:			corrective date
Type:	#		
Comment:	Lines/Pipe at and around the separator equipment not properly capped.		
Corrective Action:	Properly cap exposed lines and comply with OOSLAT requirements. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.		Date: 06/28/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	3	300 BBLS	STEEL AST		,
Comment:	"Produced Water Sweet"				
Corrective Action:		Date:			

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Comment:	Containment BMP appears to be in proper functioning condition at time of inspection.			
Corrective Action:		Date:		

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities				
Facility ID: <u>467272</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467497</u>	Type: <u>WELL</u>	API Number: <u>103-12366</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467498</u>	Type: <u>WELL</u>	API Number: <u>103-12367</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467499</u>	Type: <u>WELL</u>	API Number: <u>103-12368</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467500</u>	Type: <u>WELL</u>	API Number: <u>103-12369</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467501</u>	Type: <u>WELL</u>	API Number: <u>103-12370</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467502</u>	Type: <u>WELL</u>	API Number: <u>103-12371</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467503</u>	Type: <u>WELL</u>	API Number: <u>103-12372</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467504</u>	Type: <u>WELL</u>	API Number: <u>103-12373</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467505</u>	Type: <u>WELL</u>	API Number: <u>103-12374</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467506</u>	Type: <u>WELL</u>	API Number: <u>103-12375</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467507</u>	Type: <u>WELL</u>	API Number: <u>103-12376</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467508</u>	Type: <u>WELL</u>	API Number: <u>103-12377</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467509</u>	Type: <u>WELL</u>	API Number: <u>103-12378</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467510</u>	Type: <u>WELL</u>	API Number: <u>103-12379</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467511</u>	Type: <u>WELL</u>	API Number: <u>103-12380</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467512</u>	Type: <u>WELL</u>	API Number: <u>103-12381</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467513</u>	Type: <u>WELL</u>	API Number: <u>103-12382</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>467514</u>	Type: <u>WELL</u>	API Number: <u>103-12383</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>

Facility ID:	467515	Type:	WELL	API Number:	103-12384	Status:	PR	Insp. Status:	RI
Facility ID:	467516	Type:	WELL	API Number:	103-12385	Status:	PR	Insp. Status:	RI
Facility ID:	467518	Type:	WELL	API Number:	103-12387	Status:	PR	Insp. Status:	RI
Facility ID:	467519	Type:	WELL	API Number:	103-12388	Status:	PR	Insp. Status:	RI
Facility ID:	467520	Type:	WELL	API Number:	103-12389	Status:	PR	Insp. Status:	RI
Facility ID:	467521	Type:	WELL	API Number:	103-12390	Status:	PR	Insp. Status:	RI
Facility ID:	467522	Type:	WELL	API Number:	103-12391	Status:	PR	Insp. Status:	RI
Facility ID:	467523	Type:	WELL	API Number:	103-12392	Status:	PR	Insp. Status:	RI
Facility ID:	467524	Type:	WELL	API Number:	103-12393	Status:	PR	Insp. Status:	RI
Facility ID:	467525	Type:	WELL	API Number:	103-12394	Status:	PR	Insp. Status:	RI

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 _____ In _____

Comment _____

See "Comment #1".

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

See "Comment #1" under "COGCC Comments" at the end of this report.

Soil stockpiles observed on the southwest end of the Location, and around wells due to excavation activities at flowlines. Stockpile at flowlines observed missing BMPs to minimize erosion and sediment transport.

Corrective Action _____

Comply with Rule 1002.c and 1002.f. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.

Date **06/28/2023**

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 _____

Anchors not observed on Location.

Corrective Action _____

Date _____

1003b. Area no longer in use? Fail Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? Fail

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____

Cuttings management: Rem. Prj #24636

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 Fail Recontoured Fail 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 See "Comment #2" under "COGCC Comments" at the end of this report

Corrective Action Comply with 1003 rules. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.

Date 06/28/2023

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 ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See "Comment #3"](#)

Corrective Action: [Comply with Rule 1002.f. The "Date of Discovery" is being used as the corrective action date; Location will remain out of compliance until corrective action has been resolved.](#)

Date: 06/28/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>COMMENT #3</p> <p>Previous inspections observed that control measures to minimize erosion/degradation at the slopes and soil stockpiles of the Location, and BMPs to manage runoff and to allow for proper sediment laden-free stormwater discharge were missing or insufficient. Inspection required Operator to comply with Rule 1002.f.</p> <p>It was observed in this inspection, and within documents provided within the FIRRs, that this corrective action has been addressed.</p> <p>NEW COMPLAINT ISSUES PER THIS INSPECTION:</p> <p>It was also observed in this inspection that many of the erosion logs installed along the perimeter of the Location, and at the base of the topsoil stockpiles / fill slopes are no longer in proper functioning condition; many of the logs appear to have exceeded their "life span", other sections observed to have been flattened out/compressed, other logs appear to have been lifted up during maintenance but were not properly re-installed (trenched/backfilled) per good engineering requirements.</p>	trujilloam	06/29/2023
<p>COMMENT #2</p> <p>Records show that as of 3/24/2022, all permitted wells on the Location have been drilled, or plugged. Pursuant to Rule 1003.b, interim reclamation of the Location is required within 6 months, no later than 9/24/2022.</p> <p>It was observed in this inspection that interim reclamation pursuant to Rule 1003.b has not been performed on the Location.</p> <p>Remediation Project #24636 for the remediation and management of cuttings produced during drilling operations is currently ongoing, and is hindering the Operator's ability to comply with interim reclamation requirements.</p> <p>-Form 27(I) #403067923 was submitted on 8/8/2022. It is noted that the F27 was submitted ~5 months after the last well went into production; Remediation should have commenced upon initial production of the E&P Waste material.</p> <p>Remediation of drill cuttings / cuttings management is not interpreted as part of "drilling or subsequent operations", per the "NTO: Interim Reclamation Procedures for Delayed Operations". This Location will remain out of compliance with 1003 Rules until reclamation has been completed, or a variance per the NTO has been pursued and approved.</p>	trujilloam	06/29/2023

COMMENT #1

trujilloam

06/29/2023

Previous inspections observed that Operator has salvaged and placed topsoil along the perimeter of the Location, and utilized at the base of the fill slopes/subsoils of the Location, as a berm and sediment trap/basin to manage stormwater (See "Stormwater"); utilization of topsoil as stormwater control measures does not comport with Rule 1002.b and 1002.c. Inspections also observed that the soil stockpiles were predominantly bare/exposed; BMPs to protect the stockpiles, and to ensure topsoil remains properly segregated, protected from mixing/contamination with subsoils, and protected from displacement due to stormwater discharge were missing or insufficient.

Inspections required Operator to comply with Rule 1002.b and 1002.c.

It was observed in this inspection Operator has implemented additional BMPs to protect the topsoil stockpiles.

-Additional berms used in conjunction with erosion logs implemented to ensure fill material remains separated from topsoil.

-Topsoil hydromulched and seeded. It is noted however, that hydromulch is showing signs of degradation, and many of the erosion logs are no longer in proper functioning condition (see "Stormwater"). Maintenance advised to ensure soils remains stabilized/protected until long-term stabilization has been achieved.

This corrective action is considered "resolved".

Attached Documents

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

Document Num	Description	URL
403450636	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6166052
696205068	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6166029