

**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:

07/05/2023

Document Number:

696205077

**FIELD INSPECTION FORM**

Loc ID 479215	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED  <b>Findings:</b> 16 Number of Comments 4 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
<b>Operator Information:</b> OGCC Operator Number: 10456 Name of Operator: CAERUS PICEANCE LLC Address: 1001 17TH STREET #1600 City: DENVER State: CO Zip: 80202				<b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

<b>Contact Information:</b>			
Contact Name	Phone	Email	Comment
,		COGCC.inspections@caerus oilandgas.com	All Inspections

<b>Inspected Facilities:</b>							
Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479215	LOCATION	AC	01/14/2021		-	ELU G13-496 Central Delivery Point Production Pad	CI

**General Comment:**

On 6/28/2023, Reclamation Specialist Trujillo inspected Caerus Piceance LLC's ELU G13-496 Central Delivery Point/Production Pad location in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

- Location Assessment requirements
- Location signage
- Protection of soils
- Stormwater

Refer to the "Construction", "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.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Pursuant to Rule 605.a, Location signage is required at the Location entrance from time of construction until Reclamation is complete.

It was observed in this inspection that required Location signage has not been posted at either the northern, or southern Location entrances; No signage has been posted on the Location, including signage with Operator's emergency contact number.

Corrective Action: Comply with Rule 605.a and install required signage at the Location entrance(s). 10/27/2022 is being provided as the Corrective Action date, as Form 42 #403206939 states 10/27/2022 is the start date of construction for the Location.

Date: 10/27/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Fencing/:**

Type			
Comment:	Fencing not observed		
Corrective Action:		Date:	

**Equipment:**

Type:	#		corrective date
Comment:	No equipment installed at time of inspection. Installation of pipeline infrastructure appears to be in process.		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Location Construction**

Location ID: 479215

CDP: \_\_\_\_\_

Comment: Pursuant to Rule 406.c, 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. The Form 2A, and any Form 4 modifying the approved Form 2A not observed posted on the Location.

Corrective Action: Comply with Rule 406.c. 10/27/2022 is being provided as the Corrective Action date, as Form 42 #403206939 states 10/27/2022 is the start date of construction for the Location.

Date: 10/27/2022

**Form 2A COAs:**

**Comment:** Pursuant to Form 2A 402505441, permitted Location disturbance is 10.2 acres. A follow-up inspection will be conducted to determine compliance with Form 2A disturbance requirements.

Corrective Action:

Date:

**Wildlife BMPs:****Comment:**

Corrective Action:

Date:

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
DITCHES	Yes		

Comments: Erosion BMPs: Stormwater diversion ditch; southern/western and northern perimeter/fill slopes.

Other BMPs:

Corrective Action:

Date:

		Vehicle Tracking	No
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Comments: Erosion BMPs: Tracking controls, such as a tracking pad at the location entrance(s), to minimize off-site sediment transport not observed on Location.

Though tracking issues were not observed during inspection, it is unclear if BMPs to minimize tracking are adequate on Location during wet conditions. A followup inspection will be conducted to determine compliance with 1002.f requirements.

Other BMPs:

Corrective Action:

Date:

RETENTION PONDS	Yes		
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Comments: Erosion BMPs: Retention ponds constructed on the west and north ends of the Location. BMPs have been installed in a manner that does not permit stormwater discharge. Unclear if BMPs are adequate for the size of the Location to manage runoff.

A followup inspection will be conducted to verify if BMPs are adequate.

Other BMPs:

Corrective Action:

Date:

	Yes		
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Comments: Erosion BMPs: Hydro-mulch evident on soil stockpiles. See "Protection of Soils".

Other BMPs:

Corrective Action:

Date:

		Material Handling And Spill Prevention	Yes
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Comments: Erosion BMPs: Two (2) porta-johns. Staked down/secured to prevent spill.

Other BMPs:

Corrective Action:

Date:

WADDLES

Yes

Comments: Erosion BMPs:

Perimeter control- Operator is utilizing erosion logs in conjunction with stormwater diversion ditches to divert runoff to multiple retention ponds.

It was observed in this inspection that the majority of logs implemented have not been installed in accordance with good engineering requirements (trenched/backfilled) or maintained in a proper functioning condition.

Other BMPs:

Erosion logs throughout location not trenched/backfilled. Sections also observed to be flattened/compressed, covered in sediment, or in general disrepair.

Corrective Action: Comply with Rule 1002.f and install or maintain required BMPs in accordance with good engineering practices. The "Date of Discovery" is being provided as the corrective action date. Location will remain out of compliance until corrective action has been resolved.

Date: 06/28/202  
3

Comment:

Corrective  
Action:

Date:

**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 SEGREGATION Fail

Comment

Topsoil appears to have been mixed with subsoils- subsoils apparent within section of the topsoil berm on the west end of the Location, and on the south end of the Location. Topsoil also observed eroding back into the excavation on the south side of the Location and BMPs to stabilize soils and maintain segregation are inadequate (see 1002.c below).

This does not comport with 1002.b segregation requirements.

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS Fail

Comment

See "COGCC Comments" at the end of this report.

Corrective Action

Comply with Rule 1002.c and 1002.f. The "Date of Discovery" is being provided 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 \_\_\_\_\_

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 ☐

**COGCC Comments**

Comment	User	Date
<p><b>PROTECTION OF SOILS</b></p> <p>It was observed in this inspection that topsoil, and soil stockpile protections are inadequate on the Location.</p> <p>-BMPs to stabilize, as well as to minimize erosion, degradation and sediment transport completely missing from the topsoil stockpiles on the east end of the Location, parallel to the access road.</p> <p>-Topsoil stockpiles on the north and west end of the Location have been constructed with steep slopes and have not been stabilized; sections of the slopes were observed to be vertical. This is not proper topsoil storage and protection. Erosion/degradation and offsite sediment transport apparent.</p> <p>-Hydromulch appears to have been previously applied to stockpiles on Location, however BMP has degraded throughout the majority of the Location; BMP is no longer in proper functioning condition, and appears to be inadequate to stabilize the steep/vertical slopes of the soil stockpiles.</p> <p>-Erosion logs have been implemented at the base of the stockpiles; Erosion logs throughout location not trenched/backfilled; sections also observed to be flattened/compressed, covered in sediment, or in general disrepair.</p> <p>-BMPs to minimize erosion, and mixing with subsoils were observed to be missing, or insufficient at the excavated pipeline on the south end of the Location.</p> <p>-"Fine" soils appear to be blowing onto the soil stockpile at the Location entrance on the north end of the Location.</p>	trujilloam	07/05/2023

**Attached Documents**

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

Document Num	Description	URL
403454176	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6170236">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6170236</a>
696205078	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6170229">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6170229</a>