

**FORM
INSP**Rev
X/15**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:

08/14/2018

Submitted Date:

08/20/2018

Document Number:

682503738**FIELD INSPECTION FORM**Loc ID 387156 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10422Name of Operator: PRONGHORN OPERATING LLCAddress: 8400 E PRENTICE AVENUE #1000City: GREENWOOD State: CO Zip: 80111**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
-
- ☒
- FOLLOW UP INSPECTION REQUIRED
-
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

Findings:4 Number of Comments1 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
		zane.kuenzler@kfrcorp.com	
		jim.thorson@catamountexploration.com	
		jakeflora@kfrcorp.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
218286	WELL	PA	06/25/2015	DA	073-06271	Stegas 23-15 1	RI

General Comment:

This is a follow-up final reclamation and stormwater inspection to inspection #682503359.

This is also a follow-up inspection in response to a 1001.c, 502.b reclamation variance request. Operator submitted doc. #401270387 on 03/14/2018 requesting that ~0.35 miles of access road be left un-reclaimed and a cattle guard remain in place per the request of the surface owner. This inspection is to identify the current conditions of the location and/or any concerns that may exist, and is part of the detailed technical review process per the "1001.c: Reclamation Variances and Waivers" operator guidance document. Please refer to the guidance document for additional details.

Please note that the submission of a variance request does not guarantee approval. The COGCC will provide notice to Pronghorn Operating LLC once an official decision has been made.

All portions of the location not included in the variance request remain under COGCC jurisdiction until passing final reclamation; any corrective action(s) from previous inspections that have not been addressed will remain applicable.

Inspected Facilities									
Facility ID:	218286	Type:	WELL	API Number:	073-06271	Status:	PA	Insp. Status:	RI

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

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

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

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: _____

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed **Fail** _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control **Fail** _____

Non cropland: Revegetated 80% **Fail** _____ 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>Inspections #673503939 dated 12/13/2016, and #682503359 dated 5/15/2018 documented that location did not meet reclamation requirements and required additional reclamation activities to be conducted. Inspection #682503359 also documented pipe and various equipment/debris remaining on the northern end of the location and required removal.</p> <p>Operator has not submitted notice that corrective actions have been addressed or completed; pipe and equipment remain on the north end of the location. Unable to find evidence that additional reclamation activities have been conducted per the corrective action. Germination surveys were conducted indicating an average of <1 seedling per square foot (0.148 seedling/ft², or 0.8 seedlings/m²).</p>		Date 06/16/2018
Corrective Action:	<p>Original corrective action and date remains applicable; Remove equipment and any various debris remaining on location and perform reclamation in accordance to COGCC 1000 series rules on the LOCATION and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed.</p>	
Overall Final Reclamation Fail Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

COGCC Comments

Comment	User	Date
<p>The 502.b variance is requesting that ~0.35 miles of access road be left un-reclaimed and a cattle guard remain in place per the request of the surface owner.</p> <p>Variance request will not be approved until corrective actions have been addressed.</p>	trujilloam	08/20/2018
<p>COMMENTS COPIED FROM INSPECTION #682503359</p> <p>Form 6s #400860182 shows plugging date of 06/25/2015.</p> <p>Inspection doc. #673503939 dated 12/13/2016 failed reclamation of the location and access road, and required operator to "Remove the cattle guard and gate. Regrade and reclaim the access road. Reseed and control weed growth at the location to facilitate desirable vegetation establishment" by 04/01/2017. It is noted 1004.a requires final reclamation to be completed within twelve (12) months on non-crop land after plugging a well. Reclamation should have been conducted by 6/25/2016.</p> <p>On 06/05/2017, operator submitted a 502.b variance request to waive performing reclamation on the access road. Variance was submitted two (2) months after the corrective action date per inspection #673503939. During the initial completeness check it was determined that the minimum required information needed to process the request was not provided. Operator was notified and sundry was returned to draft on 6/13/2017. Operator re-submitted the sundry nine (9) months later on 3/14/2018.</p> <p>502.b variance request appears to be in response to a corrective action inspection.</p>	trujilloam	08/20/2018

Attached Documents

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

Document Num	Description	URL
401738562	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556760
682503739	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556746
682503740	Germination Survey	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4556747