

**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:

10/12/2018

Submitted Date:

10/15/2018

Document Number:

682504024**FIELD INSPECTION FORM**Loc ID 322636 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 69175Name of Operator: PDC ENERGY INCAddress: 1775 SHERMAN STREET - STE 3000City: DENVER State: CO Zip: 80203**Status Summary:**

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

Findings:5 Number of Comments1 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
Arthur, Denise		denise.arthur@state.co.us	
,		cogccinspection@pdce.com	ALL INSPECTIONS

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
243992	WELL	PA	11/27/2015	GW	123-11784	PESCHEL 44-20	RI
444548	TANK BATTERY	CL			-		RI

General Comment:

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

This inspection is also in response to a 1001.c, 502.b reclamation variance request. Operator submitted doc. #401486388 on 01/03/2018 requesting a waiver to not reclaim the well location, access road and facility location 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 PDC Energy Inc 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:	243992	Type:	WELL	API Number:	123-11784	Status:	PA	Insp. Status:	RI
Facility ID:	444548	Type:	TANK	API Number:	-	Status:	CL	Insp. Status:	RI

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 _____ No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed _____

Gravel removed _____

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

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

Non cropland: Revegetated 80% _____ Cropland: perennial forage **Fail**

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:

PDC has requested a SOVR to waive reclamation requirements for the well/facility location and access road. A portion of the production facility has been converted into an irrigation pond by the surface owner. Adjacent reference area to well appears to be an irrigated perennial cropland (Smooth brome). Well location remains predominantly bare and exposed soil. Access road ~150 yards from surface owner gate to well location. Production facility remains predominantly bare and exposed soil. Previous inspection documented subsidence concerns @ battery and required operator to repair. This corrective action remains applicable.

Corrective Action: **Repair subsidence concerns on production facility by 7/08/2017**

Date **07/08/2017**

Overall Final Reclamation

Well Release on Active Location ☐

Multi-Well Location ☐

COGCC Comments

Comment	User	Date
Documents within the SOVR indicates that surface owner has requested a waiver for final reclamation, on account that the SO's "irrigation pond has been expanded to include a majority of the area where the former production facility was located". PDC also indicates that the wellhead and access road starts at the alfalfa fields fence and ending at the well. The SO "does not want PDC to reclaim the well head area and access as any reclamation attempt would damage more of the SO's field and would be difficult to interseed new alfalfa". It is noted that in previous inspections (including this report) that the crop field is vegetated predominantly by perennial grass (smooth brome), not alfalfa.	trujilloam	10/15/2018
COGCC 1000 series reclamation rules require reclamation activities to be conducted within three months of plugging on cropland. Well was plugged 11/18/2015. All work should have been conducted by 2/18/2015. It is being noted that operator submitted SOVR almost 3 years after the date reclamation should have been conducted by.	trujilloam	10/15/2018

Attached Documents

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

Document Num	Description	URL
401796630	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4608834
682504025	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4608821