

**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:

12/12/2018

Submitted Date:

12/13/2018

Document Number:

682504273**FIELD INSPECTION FORM**
 Loc ID 438713 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**ANY CORRECTIVE ACTION(S) FROM  
PREVIOUS INSPECTIONS THAT HAVE NOT  
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

| Contact Name          | Phone | Email                            | Comment |
|-----------------------|-------|----------------------------------|---------|
|                       |       | <u>zane.kuenzler@kfrcorp.com</u> |         |
| <u>Arthur, Denise</u> |       | <u>denise.arthur@state.co.us</u> |         |

**Inspected Facilities:**

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

**General Comment:**

This is a follow-up final reclamation and stormwater inspection. Any corrective action(s) from previous inspections that have not been addressed are still 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: RANGELAND

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 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 **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:

Previous inspections and germination surveys documented that location did not meet reclamation requirements, and required operator to conduct additional reclamation activities and implement erosion controls to stabilize the seeded soil.

Unable to find evidence that additional reclamation activities have been conducted in accordance with 1004 reclamation rules and corrective actions. Unable to find evidence that erosion controls have been implemented to stabilize the soil in accordance with 1002.f.

Location remains predominantly bare and exposed soil with little desirable perennial vegetative germination and establishment. Corrective action and corrective action date remains applicable.

Corrective Action:

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.

Date **06/16/2018**

Overall Final Reclamation

**Fail**Well Release on Active Location ☐Multi-Well Location ☐**COGCC Comments**

| Comment  | User       | Date       |
|--|------------|------------|
| Operator submitted Doc. #401270387 requesting a variance to waive select requirements of rule 1004.a. to not reclaim not reclaim the access road. This Surface Owner Variance Request was approved with the following conditions:<br><br>1. All corrective actions identified on a field inspection report must be performed by the corrective action date as a condition of approval for this variance until final reclamation is passed<br>a. Location must comply with COGCC 1004 reclamation standards, including meeting a 80% desirable perennial vegetative cover when compared to a reference area.<br>2. Operator will continue to monitor, manage and maintain the site and access road for erosion and noxious weed control until final reclamation is passed.<br><br>Operator has failed to comply with the conditions of approval for the variance. Continued failure to comply with corrective actions, 1004.a and 1002.f rules may result in revocation of the approved variance. | trujilloam | 12/13/2018 |
| Germination surveys conducted during a previous inspections indicated an average of less than 1 seedling per square foot (0.148 seedling/ft <sup>2</sup> , or 0.8 seedlings/m <sup>2</sup> ). See inspection 682503738 for additional details.   | trujilloam | 12/13/2018 |

**Attached Documents**

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

| Document Num | Description     | URL   |
|--------------|-----------------|---|
| 682504274    | Location Photos | <a href="http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4675104">http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4675104</a> |