

**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:

04/25/2019

Submitted Date:

05/01/2019

Document Number:

682504828**FIELD INSPECTION FORM**
 Loc ID 313925 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10548Name of Operator: HRM RESOURCES II LLCAddress: 410 17TH STREET #1600City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:6 Number of Comments2 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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
,		dnr_cogccenforcement@state.co.us	
		lrhuton@hrmres.com	
		richard_cottle@pogresources.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
227270	WELL	PA	04/15/2016	GW	087-08013	ALISSA 1	RI

General Comment:

This is a follow-up final reclamation inspection to inspection #682500705, #682501380, #682501959 #675103907, and #682502647

This inspection is to document compliance for the following corrective actions:

1004.a: Perform reclamation in accordance to COGCC 1000 series reclamation rules. Remove gravel and perform compaction alleviation, re-grade/re-contour access road to that of the adjacent reference areas. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.

COGCC records show HRM Resources II LLC #10548 as operator on record for the well, and P O & G Operating LLC #10634 as the operator on record for the location. This inspection is being submitted to both operators.

Any corrective actions from previous inspections that have not been addressed are still applicable. All responses/questions regarding this inspection and related corrective actions will need to be directed to COGCC Enforcement Supervisor Jeremy Ferrin (jeremy.ferrin@state.co.us).

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 _____ Contoured _____ Culverts removed _____

Gravel removed _____

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

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

Non cropland: Revegetated 80% _____ In _____ 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: [See "COGCC Comments" for comments regarding Reclamation](#)

Corrective Action: _____ Date **11/15/2016**

Perform reclamation in accordance to COGCC 1000 series reclamation rules. Perform compaction alleviation, re-grade/re-contour access road to that of the adjacent reference areas. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture that matches the adjacent pastureland or a seed mixture requested by the landowner. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. Revegetation activities shall be complete no later than 11/15/2016

Overall Final Reclamation

Fail

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: Previous inspections documented erosion degradation on the western slope of the location and required operator to repair, install BMPs and monitor. Erosion degradation is beginning to recur on the west end of the location. Stormwater BMPs do not appear to be sufficient, or installed in a sufficient manner to mitigate stormwater erosion degradation.

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: 05/25/2019

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Smooth brome (<i>Bromus inermis</i>) evident on location and appears to have been included within the seed mix. This species does not reflect vegetation observed within the adjacent pastureland.	trujilloam	05/01/2019
RECLAMATION COMMENT #1	trujilloam	05/01/2019
On 4/25/2019, Reclamation Specialist Trujillo conducted five germination transects (4 on the location, 1 on the access road) to document the progression of reclamation on the location. Transects show that the well location has a total average of 7 seedlings per 1/2 square meter, and the access road 1.5 seedlings per 1/2 square meter. This is below the 16-27 plants per 1/2 square meter goal post initial reclamation work.		
Location within second growing season since reclamation work. This location and access road does not meet the germination goal desired for reclamation. Additionally, there are large areas of the location that remain bare and exposed soil, with little to no germination and/or desirable vegetative establishment occurring. Undesirable weedy plant species such as <i>Kochia</i> and puncture vine evident throughout the location. Additional seeding activities and weed management will likely be required.		

RECLAMATION COMMENT #2

trujilloam

05/01/2019

Previous reclamation inspections required operator to perform reclamation in accordance to COGCC 1000 series reclamation rules including, but not limited to, performing of compaction alleviation, and re-contouring/re-grading the access road to that of the adjacent reference areas.

Inspection #682502647 on 10/10/2017 documented a contractor conducting work for the operator. Contractor was in the process of bringing additional topsoil for the access road at the time of inspection. After conversations between Reclamation Specialist Trujillo and the contractor, it was determined that soil was being imported to re-grade the access road, followed by seeding. However, contractor stated that compaction alleviation on the access road was not done prior to importing topsoil, and that plans to conduct compaction alleviation was not scheduled.

Operator was notified in the 10/10/2017 inspection (as well as inspections dated on 4/15/2016, 9/27/2016, 5/2/2017 and 8/24/2017) that access road required compaction alleviation in accordance with COGCC 1000 reclamation requirements.

Operator submitted Form 42 #401458177 on 11/14/2017 stating all corrective actions per FIR #682502647 have been performed.

On 4/25/2019, Reclamation Specialist tested for compaction alleviation by digging a test pit on the access road. Reclamation Specialist discovered compaction concerns beginning at seven (7) inches below ground level. See attached photo document. Operator does not appear to have conducted compaction alleviation in accordance with Rule 1004.a (1003.c) and corrective actions. As a result, the original corrective action and corrective action date will remain applicable until all reclamation work and activities have been conducted in accordance to COGCC 1000 series reclamation rules and requirements.

Attached Documents

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

Document Num	Description	URL
682504830	Transect Data Sheet	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811619
682504832	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811620