

**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 <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <input checked="" 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> 6 Number of Comments 2 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
<b>Operator Information:</b> OGCC Operator Number: <u>10548</u> Name of Operator: <u>HRM RESOURCES II LLC</u> Address: <u>410 17TH STREET #1600</u> City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>				<b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

**Contact Information:**

Contact Name	Phone	Email	Comment
,		dnr_cogccenforcement@state.co.us	
		lrhutson@hrmres.com	
		richard_cottle@pogresources.com	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	

**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).

Inspected Facilities									
Facility ID:	227270	Type:	WELL	API Number:	087-08013	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 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: \_\_\_\_\_

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
<p><b>RECLAMATION COMMENT #2</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Operator submitted Form 42 #401458177 on 11/14/2017 stating all corrective actions per FIR #682502647 have been performed.</p> <p>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.</p>	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 Kochia and puncture vine evident throughout the location. Additional seeding activities and weed management will likely be required.

Smooth brome (*Bromus inermis*) 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

**Attached Documents**

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

Document Num	Description	URL
402028228	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811634">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811634</a>
682504830	Transect Data Sheet	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811619">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811619</a>
682504832	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811620">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811620</a>