

**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 _____ Inspector Name: _____ On-Site Inspection
313925 _____ Trujillo, Aaron _____ 2A Doc Num: _____

Status Summary:
 THIS IS A FOLLOW UP INSPECTION
 FOLLOW UP INSPECTION REQUIRED
 NO FOLLOW UP INSPECTION REQUIRED

Operator Information:
OGCC Operator Number: 10548
Name of Operator: HRM RESOURCES II LLC
Address: 410 17TH STREET #1600
City: DENVER State: CO Zip: 80202

Findings:
6 Number of Comments
2 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
		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

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:

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>RECLAMATION COMMENT #2</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

<p>RECLAMATION COMMENT #1</p> <p>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.</p> <p>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.</p>	trujilloam	05/01/2019
<p>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.</p>	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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4811634
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