

**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:

05/10/2019

Submitted Date:

05/10/2019

Document Number:

696200038

**FIELD INSPECTION FORM**Loc ID 454154 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10657

Name of Operator: PCR OPERATING LLC

Address: 4040 BROADWAY STREET #510

City: SAN ANTONIO State: TX Zip: 78209

**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

9 Number of Comments

9 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
		gwehrer@passcreekresource s.com	
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		dnr_cogccenforcement@state .co.us	
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Young, Rob		rob.young@state.co.us	
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		dkunovic@passcreekresource s.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
454154	LOCATION	AC			-	CLAR 158-24-21	RI
454155	WELL	PR	10/01/2018		087-08223	CLAR 158-24-21	RI

**General Comment:**

This is an interim reclamation and stormwater inspection.

#### COGCC Inspection Report Summary

On Friday, 5/10/2019 at approximately 1100 hours, Reclamation Specialist Trujillo conducted a reclamation inspection at PCR Operating LLC's CLAR 15-24-21 location #454154 in Morgan County Colorado.

During this inspection the following possible compliance issues were observed:

- No Form 42 "Notice of Construction" submitted for location
  - Insufficient stormwater and erosion controls and BMPs on location and soil stockpiles
  - Fluid spill and stained soils (approximately 15 ft. x 20 ft. of produced liquids) at wellhead
  - Oily materials within the drill pit
  - Trash debris within drill pit
  - Noxious weeds on location and soil stockpiles
  - Undesirable weedy plant vegetative establishment on soil stockpiles
  - Drill cuttings evident outside of drill pit
  - Non-compliance with COA #4 on the permitted 2A doc. #401482918 requiring drill pit to be closed no later than three (3) months after drilling/completion
  - No interim reclamation conducted in accordance with 1003.b
- Refer to the attached photo documentation of observed compliance issue.

Reclamation Specialist Trujillo spoke with Mr. Gene Wehrer with PCR Operating at approximately 1150 hours on the tank battery location (Location #454195). Mr. Wehrer was notified about the fluid spill observed at the well, and the oily material within the drill pit, and provided with the 24 hour notice to address the issues.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules. Due to the significant nature, extent, or duration of this alleged rule violation immediate referral to enforcement is required and a corrective action date will not be applied. Perform the corrective action immediately (no later than 24 hours) to avoid further enforcement and potential penalties. This inspection is being entered for notification and documentation only and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c. Any corrective action(s) from previous inspections that have not been addressed are still applicable.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	WEEDS		
Comment:	Canada thistle (Cirsium arvense) and Scotch thistle (Onopordum acanthium) rosettes observed on the location and soil stockpiles on the north and south end of the location. These are Colorado State listed noxious weeds and need to be managed. See photos 8-9, 12, and 19 in the attached photo document.		
Corrective Action:	Comply with 603.f and 1003.f, and conduct weed management.	Date:	
Type	TRASH		
Comment:	Various materials/trash debris observed within the southwest end of the drill pit. Trash partially covered with drill cuttings. See photo 26 in the attached photo document.		
Corrective Action:	Comply with 603.f, remove and properly dispose trash debris.	Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
Comment:	Hydrocarbons observed within drill pit. See photo 25 in the attached photo document  Reclamation Specialist Trujillo spoke with Mr. Gene Wehrer with PCR Operating at approximately 1150 hours on the tank battery location (Location #454195). Mr. Wehrer was notified about oily materials observed within the drill pit, and provided with the 24 hour notice to address the issues.			
Corrective Action:	Remove oil from pit per Rule 902.c within 24 hours.			Date:
	WELLHEAD			
Comment:	Fluid spill and stained soils (approximately 15 ft. x 20 ft. of produced liquids) observed at wellhead. See photos 2 and 3 in the attached photo document.  Reclamation Specialist Trujillo spoke with Mr. Gene Wehrer with PCR Operating at approximately 1150 hours on the tank battery location (Location #454195). Mr. Wehrer was notified about the fluid spill observed at the well and provided with the 24 hour notice to address the issues.			
Corrective Action:	Control/contain fluid spill and clean up stained soils per 906.a within 24 hours, and contact COGCC EPS staff per Rule 906.b.			Date:

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		

Corrective Action:		Date:	
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### Location Construction

Location ID: 454154 CDP: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: Location appears to have been constructed approximately March/April of 2018 (SPUD date 4/11/2018). COGCC Rule 316C.c requires that "Operators shall give at least 48 hours advance written notice of intent to the Commission of a construction or major change at any Well, Oil and Gas Locations, or Oil and Gas Facility. Such notice shall be provided on a Field Operations Notice, Form 42 - Notice of Construction or Major Change".

Date: \_\_\_\_\_

Notice was not submitted 48 hours prior to beginning operations; No Form 42 "Notice of Construction" submitted.

**Form 2A COAs:**

Comment: \_\_\_\_\_

Corrective Action: COA #4 on the permitted 2A doc. #401482918 required drill pit to be closed no later than three (3) months after drilling/completion. COGCC Well file records show production date of 10/2018. Pit should have been closed no later than 1/2018 in accordance with COAs.

Date: \_\_\_\_\_

**Wildlife BMPs:**

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date: \_\_\_\_\_

**On Site Inspection (305):**Surface Owner Contact Information:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Cell Phone: \_\_\_\_\_

Operator Rep. Contact Information:

Landman Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Date Onsite Request Received: \_\_\_\_\_

Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

LGD Contact Information:

Name: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Agreed to Attend: \_\_\_\_\_

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities									
Facility ID:	<u>454154</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>	
Facility ID:	<u>454155</u>	Type:	<u>WELL</u>	API Number:	<u>087-08223</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>

**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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment

1002.c requires "All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented".

Noxious and undesirable weedy plant species evident/established on the soil stockpiles of the location. Operator does not appear to have implemented BMPs to protect stockpiled soils on location.

Corrective Action

Comply with 1002.c

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? Fail Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? Fail

1003d. Drilling pit closed? Fail Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: On site

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? Fail

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? Fail

## RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

## 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? F

Comment SEE "COGCC COMMENTS" FOR COMMENTS REGARDING RECLAMATION

Corrective Action Comply with COGCC 1003 Interim Reclamation Rules including, but not limited to, compaction alleviation per 1003.c, close drill pit per 1003.d, and 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 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 location until reclamation has passed.

Date \_\_\_\_\_

Overall Interim Reclamation Fail

**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 \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ 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
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Insufficient stormwater and erosion control BMPs observed on location; Operator does not appear to have implemented BMPs on location prior to, during, or post construction activities. Erosion degradation evident on soil stockpiles; no BMPs appear to have implemented to stabilize soil stockpiles, or mitigate sediment transport from stockpiles, and from location.

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

Date:

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
COGCC Rule 1003.b requires "All disturbed areas affected by drilling or subsequent operations, except areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable... Interim reclamation shall occur no later than six (6) months on non-crop land after such operations.."	trujilloam	05/10/2019
Drill pit remains open and areas not needed for production on the location have not been reclaimed in accordance with 1003 rules. Well file records show initial production and well status "PR" as of Oct. 2018. Interim reclamation should have been conducted no later than April 2019. Additionally, noxious weed species observed on location. See "Good Housekeeping".		

**Attached Documents**

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

Document Num	Description	URL
402040835	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4821065">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4821065</a>
696200039	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4821060">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4821060</a>