

**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:

08/28/2019

Submitted Date:

08/29/2019

Document Number:

696200704**FIELD INSPECTION FORM**
 Loc ID 324938 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10634Name of Operator: P O & G OPERATING LLCAddress: 5847 SAN FELIPE SUITE 3200City: HOUSTON State: TX Zip: 77057**Status Summary:**

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

Findings:7 Number of Comments4 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
Kosola, Jason		jason.kosola@state.co.us	
		richard_cottle@pogresources.com	
		wendy_colotta@pogresources.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
213633	WELL	SI	07/01/2016	OW	063-06192	LOWE B-2	SI
324938	LOCATION	AC			-	LOWE-611S46W 14NWNE	RI
463250	Location	AC			-	Petx-Lowe 1-A	RI

General Comment:

On 8/28/2019, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at PO&G Operating's Lowe B-2 location, and the Petx-Lowe 1-A facility location in Kit Carson County, Colorado.

This inspection is in response to Sundry #402122863 submitted by PO&G stating "Final reclamation complete, site ready for inspection" in accordance with 1004.c.

It was documented that location does not meet final reclamation standards and requirements.

The following alleged compliance issues were observed during this inspection:

906.a: Spills and releases; stained soils observed on locations.

1003.c: Compaction alleviation issues observed on locations

1004.a: Surface equipment observed remaining on location.

1004.a: Trash debris observed remaining on locations

1004.a: Failed to conduct reclamation on access road.

1004.a: Gravel / Road base observed either buried, or left on surface of locations.

1004.a: Culverts remaining

Refer to the "Good Housekeeping", "Environmental" and "Final Reclamation" section of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	DEBRIS		
Comment:	<p>1004.a requires all trash / debris is to be removed from a location within three (3) months of plugging.</p> <p>It was observed that various trash debris (plastic pipe, buried cables, barrel, t-posts, etc...) was observed at the well and facility location. See photos 3-6, 23 and 27.</p>		
Corrective Action:	Comply with Rule 603.f and 1004.a. to remove all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (11/30/2018) the associated facility. A corrective action date of 2/28/2019 is being provided as work should have been conducted by this date	Date:	02/28/2019
Type	UNUSED EQUIPMENT		
Comment:	<p>1004.a requires the removal of all surface equipment within three (3) months of plugging.</p> <p>It was observed that a white plastic pipe was left on the south end of the location, and a riser was observed remaining on the southeast end of the facility location. See photos 5-6 and 25.</p> <p>See "COGCC Comments" for additional comments regarding the riser.</p>		
Corrective Action:	Comply with Rule 1004.a. to remove (regardless of ownership) all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (11/30/2018) the associated facility. A corrective action date of 2/28/2019 is being provided as work should have been conducted by this date	Date:	02/28/2019

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: <u>213633</u>	Type: <u>WELL</u>	API Number: <u>063-06192</u>	Status: <u>SI</u>	Insp. Status: <u>SI</u>
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Facility ID: <u>324938</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
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Facility ID: <u>463250</u>	Type: <u>Location</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
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Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Stained soil observed in test pit conducted by Reclamation specialist on well location. Stained soil also observed on the facility location. See photos 7-11, and 24Corrective Action: Control and contain spills/releases and clean up per Rule 906.a. Contact COGCC Area EPS Jason Kosola within 7 days to discuss delineation plan. Operator shall submit Form 19 Initial Spill Report outlining potential spill within 7 days.

Date: 09/05/2019

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Spill/Remediation:

Comment: _____

Corrective
Action: _____

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____

Wildlife Protection Devices (fired vessels): _____

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 **Fail** Contoured **Fail** Culverts removed **Fail**

Gravel removed **Fail**

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

Compaction alleviation **Fail** 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: **Multiple reclamation concerns were observed during the inspection. See "COGCC Comments" for additional information.**

Corrective Action: _____ Date **10/31/2019**

Comply with 1004 rules; Conduct final reclamation including, but not limited to, the removal of gravel/road base at well and facility location, removal of culverts at access road / facility location, compaction alleviation (cross-ripping to a minimum of 18 inches) at well location/ access road / facility location, recontouring/regrading 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 site until Final Reclamation has passed.

Overall Final Reclamation

Fail

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

Comment	User	Date
Riser remaining at facility location possibly midstream.	trujilloam	08/29/2019
PO&G remains responsible for the management and removal of all oil and gas associated equipment on their locations. Riser will require removal in accordance to 1004.a. If riser is midstream, then it is the COGCC's expectation that PO&G will work the the midstream company to have the riser removed and the location reclaimed.		
Location will remain out of compliance until all equipment has been removed.		
COMMENTS REGARDING FINAL RECLAMATION	trujilloam	08/29/2019
Sundry #402122863 submitted by PO&G stating "Final reclamation complete, site ready for inspection".		
This location does not meet reclamation standards and requirements in accordance with 1004.a		
It was observed that no reclamation has been conducted on the east/west access road to the north of the location. No 502.b surface owner variance has been submitted and/or approved to waive reclamation requirements of the access road. Historic aerial imagery shows access road does not pre-exist the Oil and gas locations. Road was constructed for industrial oil and gas access and is subject to COGCC 1004 final reclamation rules and requirements. See photos 15-17, 30		
Two culverts were observed at the access road, and facility location entrance. Culverts require removal and reclamation required in accordance with 1004.a. See photo 26.		
Reclamation specialist conducted a test pit to determine compliance with compaction alleviation requirements. Large quantities of gravel was observed within the test pit starting at ~4-6 inches subsurface. Soils also appear to be stained and possibly contaminated. Gravel/road base observed is not native material or reflective of the reference area, and appears to have been buried at the well location. This material is not conducive to reclamation and needs to be removed. If insufficient topsoil remains post excavation or remediation of gravel material / stained soils to address potential subsidence concerns, and to recontour/regrade location to the adjacent lands, then Operator will be required to import clean topsoil comparative to the reference area to comply with 1004.a. See photos 7-14.		
It was also observed that gravel/road base has not been removed from the facility location. See photo 22		
Compaction concerns observed on both the well location, and facility location. Operator submitted photos attached with Sundry doc. #402119982 showing compaction alleviation work conducted. Based on Operator's photos, Operator does not appear to have cross-ripped to a minimum depth of 18 inches in accordance with 1003.c. See photos 7-14, 28, 29.		
Surface equipment and trash debris observed on the well and facility locations. 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
696200705	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4925246