

**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:

696200706

**FIELD INSPECTION FORM**

Loc ID Inspector Name: On-Site Inspection ☐  
 324936 Trujillo, Aaron 2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 10634

Name of Operator: P O &amp; G OPERATING LLC

Address: 5847 SAN FELIPE SUITE 3200

City: 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 Comments

4 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
		wendy_colotta@pogresources.com	
		richard_cottle@pogresources.com	
		jason.kosola@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
213626	WELL	SI	07/01/2016	OW	063-06185	PETX-LOWE 1A	RI
324936	LOCATION	AC			-	PETX-LOWE-611S46W 14NENW	RI

**General Comment:**

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

This inspection is in response to Sundry #402119982 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.

1002.f: Stormwater erosion

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.e: Noxious weed management.

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.

**Location**Overall Good: ☐

Emergency Contact Number:

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

Type	DEBRIS		
Comment:	1004.a requires all trash / debris is to be removed from a location within three (3) months of plugging.  It was observed that various trash debris (pipe, t-posts, etc...) was observed remaining on the location. See photos 7-9.		
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 (11/28/2018) 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:	1004.a requires the removal of all surface equipment within three (3) months of plugging.  It was observed that a white plastic pipe was left on the east of the location. See photo 7		
Corrective Action:	Comply with Rule 1004.a. to remove all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (11/28/2018) 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>213626</u>	Type:	<u>WELL</u>	API Number:	<u>063-06185</u>	Status:	<u>SI</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>324936</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: [Stained soil observed in test pit conducted by Reclamation specialist on well location. See photos 10-13](#)Corrective Action: [Control and contain spills/releases and clean up per Rule 906.a. Contact COGCC Area EPSJason 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: \_\_\_\_\_

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

Gravel removed **Fail**

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

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

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage \_\_\_\_\_

Weeds present **Fail** 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 1002.f and install/repair required stormwater BMPs. Comply with 1004.e and conduct weed management. Comply with 1004 rules; Conduct final reclamation including, but not limited to, the removal of gravel/road base, compaction alleviation (cross-ripping to a minimum of 18 inches) at well location/access road, recontouring/regrading and establish vegetation on location/access road with a 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. Monitor and manage this site until passing final Rec

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
Mulching	Fail	Mulching	Fail			

Comment: Stormwater erosion degradation observed on access road. See "Reclamation". Ongoing stormwater monitoring and management is required in accordance with 1002.f.(2) until final reclamation is achieved pursuant to Rule 1004

Corrective Action:

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

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

Comment	User	Date
<p><b>COMMENTS REGARDING FINAL RECLAMATION</b></p> <p>Sundry #402119982 submitted by PO&amp;G stating "Final reclamation complete, site ready for inspection"</p> <p>This location does not meet reclamation standards and requirements in accordance with 1004.a.</p> <p>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 17-20</p> <p>Stained soils observed on the location. See "Environmental". If insufficient topsoil remains post excavation/removal or remediation of 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 10-13.</p> <p>Compaction concerns observed on 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 crossripped to a minimum depth of 18 inches in accordance with 1003.c. See photos 14-16.</p> <p>Noxious weeds (Canada thistle, Puncture vine) observed on the southern end of the location and access road. See Photos 4, 6.</p> <p>Stormwater erosion degradation observed on the access road. See photo 5.</p> <p>Surface equipment and trash debris observed on the well and facility locations. See "Good housekeeping"</p>	trujilloam	08/29/2019

**Attached Documents**

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

Document Num	Description	URL
402162033	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4925253">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4925253</a>
696200707	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4925249">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4925249</a>