

**FORM
INSP**

Rev
X/20

**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:

06/21/2023

Submitted Date:

06/23/2023

Document Number:

696205045

FIELD INSPECTION FORM

Loc ID: 322302 Inspector Name: Trujillo, Aaron On-Site Inspection: 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: 10241
 Name of Operator: PRE RESOURCES INC
 Address: 1888 SHERMAN STREET #760
 City: DENVER State: CO Zip: 80203

Findings:

- 4 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	
		bvanblaricom@prellc.com	
		trogers@prellc.com	
		mchoury@prellc.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
210206	WELL	PA	07/16/2016	GW	045-05108	GOVERNMENT BUTTRAM 1	RI
322302	LOCATION	CL			-	GOVERNMENT BUTTRAM-65S102W 30W2SW	RI

General Comment:

On 6/21/2023, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at PRE Resources Inc's Government Buttram 1 location in Garfield County, Colorado.

This is also a follow-up inspection to #696203758 dated 6/14/2022, #696204007 dated 8/23/2022, #696204441 dated 12/5/2022, and NOAV #403429381 to document compliance for the following corrective actions:

- Comply with 1004 Rules by 7/31/2022
- Comply with Rule 1002.f by 8/25/2022

It was observed in this inspection that the Location remains out of compliance with COGCC Rules, corrective actions, and NOAV corrective actions.

The following compliance issues were observed during this inspection:

Refer to the "Reclamation" and "Stormwater" sections 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 inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Inspected Facilities

Facility ID: 210206 Type: WELL API Number: 045-05108 Status: PA Insp. Status: RI

Facility ID: 322302 Type: LOCATION API Number: - Status: CL 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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

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

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:

Corrective Action:

Date **07/31/2022**

Comply with 1004 rules and conduct final reclamation of the Location including by not limited to compaction alleviation, recontouring and revegetating; conduct weed management and continue to monitor/manage Undesirable and Noxious plants to prevent further spread and establishment. Weed management is required until site receives a passing final reclamation inspection pursuant to Rules 1004.e and 606.c.

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
	Fail		Fail			

Comment: Previous inspections observed that BMPs to control stormwater runoff in a manner that minimize erosion, sediment transport and site degradation are missing from the access road, and cut slopes of the Location; gully erosion evident. Inspection required Operator to comply with 1002.f, and the temporary BMPs are required until final reclamation work is completed, at which point additional BMPs will be required to stabilize the seeded soils and reclamation areas.

It was observed in this inspection that stormwater and erosion control BMPs remain missing or insufficient; unable to find evidence that work to address the CA was conducted; erosion degradation has persisted. Original CA and CA date remains applicable.

Corrective Action: Comply with 1002.f; implement and maintain stormwater and erosion control BMPs in accordance with good engineering practices. Ongoing stormwater monitoring/management required until site receives a passing final reclamation inspection.

Date: 08/25/2022

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>RECLAMATION COMMENT</p> <p>Inspection #696203758 dated 6/14/2022, #696204007 dated 8/23/2022, #696204441 dated 12/5/2022 observed that final reclamation has not been completed; Location and access road have not been decompacted, recontoured and reclaimed- Cut/fill slope remains evident and working pad has been left flat; secondary containment berms remain evident; gravel has not been removed; surface equipment (pipe) remaining on northwest end of the Location; Vegetation on Location is predominantly Undesirable and Noxious Plant Species including, but not limited to, Field Bindweed, Redstem filaree, Hoary Cress, etc... Inspections required Operator to comply with 1004 Rules by 7/31/2022.</p> <p>It was observed in this inspection that 1004 final reclamation work including, but not limited to, compaction alleviation, recontouring/regrading, and revegetation has not been conducted; weed management has not been performed, or has been inadequate; Undesirable and Noxious Plant Species has continued to establish and spread throughout the Location. Pipe remaining on the north end of the Location. Erosion degradation remains evident along cut slopes (see "Stormwater").</p> <p>Corrective actions have not been addressed and remain applicable.</p>	trujilloam	06/23/2023

Attached Documents

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

Document Num	Description	URL
403443487	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6158635
696205046	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6158634