

**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:

04/12/2024

Submitted Date:

04/15/2024

Document Number:

696205748

**FIELD INSPECTION FORM**Loc ID 322369 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

ECMC Operator Number: 10770

Name of Operator: VISION ENERGY LLC

Address: P O BOX 370

City: IGNACIO State: CO Zip: 81137

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

9 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
Katz, Aaron		aaron.katz@state.co.us	
		mollieo@maralexinc.com	
Arauza, Steven		steven.arauza@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
210371	WELL	SI	08/01/2021	GW	045-06127	RIFLE-BOULTON 1	RI

**General Comment:**

On 4/12/2024, Reclamation Specialist Trujillo conducted a final reclamation inspection at VISION ENERGY LLC's RIFLE WALTON #1 location in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

Rule 405.i - Notice of plugging requirements  
 1005/405.r - Flowline abandonment requirements  
 1004- Final Reclamation; removal of surface equipment, trash, debris  
 Form 27 403400653 COA Requirements  
 913 reporting requirements

Refer to the "Location", "Reclamation" and "Environmental" sections of this inspection report for additional details.

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

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

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

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

corrective date

Type: Flow Line

#

Comment:

Well was P&amp;Ad 9/14/2023. Excavation activities along a flowline path evident; Operator appears to have conducted flowline removal/abandonment activities.

Unable to find records of a Form 42- Notice of abandonment of Flowline submitted before undertaking and after completing abandonment of on-location flowlines pursuant to Rule 1105.

Meter shed equipment and lines remain on the Location. Refer to the "reclamation" section for corrective action regarding removal of equipment. Lines at equipment are currently open; lines have not been covered/capped or OOSLAT.

Corrective Action: **Comply with Rule 1105.**Date: 04/13/2024

Type:

#

Comment:

A "monitoring well" was observed on the southwest end of the Location, behind the meter equipment. Unable to find permit information or other DWR records for the monitoring well.

Corrective Action: **1) Operator shall contact Colorado DWR for permitting and plugging requirements.****2) Operator shall, attached to a Form 4, submit documentation of correspondence regarding the monitoring well, and any requirements/conditions provided by DWR.****3) Operator shall plug and remove well/equipment from the Location as part of ECMC 1004 Final Reclamation requirements.**Date: 04/29/2024

Type:

#

Comment:

Form 6(s) #403558967 submitted 10/16/2023. Form "in process" at time of writing this report.

Advise contacting ECMC Area Engineer regarding Form status update and/or for any additional information that may be required.

Corrective Action:

Date:

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:		Date:	
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Inspected Facilities									
Facility ID:	210371	Type:	WELL	API Number:	045-06127	Status:	SI	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental

Spill/Remediation:

Comment: Form 27i #403400653 for 911 facility closure requirements submitted. F27 was approved on 6/13/2023 with the following conditions:

Operator will provide updates to the Adequacy of Operator's General Liability Insurance and Financial Assurance and a remaining cost estimate on the next Form 27 submitted for this project;

Comply with COGCC Rule 1105 flowline abandonment requirements, including notification and verification requirements;

Operator shall collect soil samples from areas most likely to be impacted and shall collect an appropriate number of representative soil samples to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B;

Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination in excess of the cleanup concentrations in Table 915-1 for soil and groundwater. The Operator shall analyze samples for the complete Table 915-1 list and shall compare analytical results for site investigation samples to both the Table 915-1 Residential Soil Screening Level Concentrations and the Protection of Groundwater Soil Screening Level Concentrations. Submit an assessment of potential pathways to groundwater via a Supplemental Form 27.

Additionally, pursuant to Rule 913.e, After initial approval of a Form 27, Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and Remediation.

No subsequent Form 27 has been submitted with the required information.

Corrective Action:	Comply with 913 reporting requirements.	Date: 04/17/2024
	Comply with F27 403400653 COAs.	

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 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 **Fail** \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ In \_\_\_\_\_ Contoured \_\_\_\_\_ In \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_ In \_\_\_\_\_

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

Compaction alleviation \_\_\_\_\_ In \_\_\_\_\_ 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:

	<p>It was observed in this inspection that surface equipment (meter shed, anchor equipment) remains on the Location.</p> <p>Various pipe equipment, fence materials and other trash/debris/rubbish also observed on the Location.</p> <p>Records show Well was P&amp;Ad 9/14/2023. Pursuant to Rule 1004.a, All debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well; equipment and other materials was required to be removed by 12/14/2023.</p>	
Corrective Action:	<p>Comply with Rule 1004.a.</p> <p>Records show Well was P&amp;Ad 9/14/2023. Pursuant to Rule 1004.a, All debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well; equipment and other materials was required to be removed by 12/14/2023.</p>	Date _____
<p>Overall Final Reclamation <span style="color: red;">Fail</span>      Well Release on Active Location <input type="checkbox"/>      Multi-Well Location <input type="checkbox"/></p>		

**ECMC Comments**

Comment	User	Date
<p>Pursuant to Rule 405.I, Operators will give at least 48 hours advance written notice to the Commission prior to mobilizing for plugging any Well. Such notice will be provided on a Form 42, Field Operations Notice – Plugging Operations.</p> <p>Pursuant to Form 6(N) 403397810 conditions of approval, Operator was required to provide electronic Form 42 Notice of Plugging Operations 48 hours prior to mobilizing for plugging operations.</p> <p>Operator submitted Form 6(s) on 10/16/2023 stating surface plug setting date was 9/2/2023, and the cut and cap date was 9/14/2023.</p> <p>Unable to find records that a Form 42 Field Operations Notice – Plugging Operations was submitted 48 hours prior to plugging operations.</p>	trujilloam	04/15/2024
<p>Pursuant to Form 6(N) 403397810 conditions of approval, Operator was required to provide electronic Form 42 Notice of MIRU 2 business days ahead of operations 48 hours prior to mobilizing for plugging operations.</p> <p>Operator submitted Form 6(S) on 10/16/2023 stating surface plug setting date was 9/2/2023, and the cut and cap date was 9/14/2023.</p> <p>Unable to find records that a Form 42 Notice of MIRU was submitted 48 hours prior to plugging operations.</p>	trujilloam	04/15/2024
<p><b>ADDITIONAL RECLAMATION COMMENTS</b></p> <p>Other 1004 requirements including, but not limited to, compaction alleviation, removal of gravel, recontouring/regrading and revegetation activities remain outstanding on the Location and access road. Reclamation work pursuant to Rule 1004.a required to be completed within 12 months after plugging well.</p>	trujilloam	04/15/2024

**Attached Documents**

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

Document Num	Description	URL
403754910	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6509209">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6509209</a>
696205749	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6509166">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6509166</a>