

**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:

05/23/2024

Submitted Date:

05/24/2024

Document Number:

708201274

FIELD INSPECTION FORM

Loc ID 451646 Inspector Name: Edwardson, Dylan 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:

ECMC Operator Number: 10694
Name of Operator: PROVIDENCE OPERATING LLC DBA POCO
Address: 16400 DALLAS PARKWAY SUITE 400
City: DALLAS State: TX Zip: 75428

Findings:

- 18 Number of Comments
- 8 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
Maxwell, Logan		logan.maxwell@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Grimes, Meghan		mgrimes@providence-energy.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
451646	LOCATION	AC			-	Brighton Lakes 20-17	CI

General Comment:

This is a Construction and Stormwater Inspection in response to Form 42: Notice of Construction- Document #403794389. A POCO Lease Operator was present at this time of this inspection.

Refer to the following sections for additional information:

- Location
- Location Construction
- Reclamation/Stormwater
- ECMC Inspector Comments

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	Undesirable vegetation (e.g. kochia, russian thistle and prickly lettuce) and Colorado Noxious Weeds (List B - scotch thistle, canada thistle and List C - downy brome, field bindweed) were observed throughout the location and the topsoil stockpile areas. Herbicide indicator (e.g. blue dye) was observed around the paved portions of the location/working pad surface; Staff did not observe any indicator on undesirable/noxious weeds outside of the paved portions.		
Corrective Action:	Comply with Rule 606 to control/manage/remove undesirable and noxious vegetation.	Date:	05/31/2024
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (e.g. piping) observed on the north side of tank battery, within secondary containment.		
Corrective Action:	Comply with Rule 606 to remove any unused equipment.	Date:	05/31/2024
Type	OTHER		
Comment:	Stained soils observed throughout secondary containment at tank battery, near wellheads, at engine/motor skids and throughout portions of the production areas. Refer to attached inspection photos for examples.		
Corrective Action:	Properly dispose of oily waste in accordance with Rule 905.e.	Date:	06/07/2024
Type	OTHER		
Comment:	Concrete aggregate (un-mixed) observed on the southeast portion of the pad is a potential stormwater pollutant source and requires removal. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606 and remove concrete debris.	Date:	05/31/2024

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:

Type:		#		corrective date
Type: Bird Protectors				
Comment:	Secondary containment at pigging station did not have adequate wildlife protection equipment (e.g. netting). One was torn and the other did not have any netting observed.			
Corrective Action:	Comply with Rule 902.b and install or repair wildlife protection equipment.			Date: 06/03/2024
Type: Other				
Comment:	Motor/compressor on NW corner of tank battery secondary containment appears to be leaking with hydrocarbon staining underneath. Refer to attached inspection photos.			
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.			Date: 06/07/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 451646 CDP: _____

Comment: At the time of this inspection, Staff did not observe a Form 2A posted on location. Per Rule 406.c. a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim reclamation.

Corrective Action: Comply with Rule 406.c. **Date:** 05/25/2024

Form 2A COAs:

Comment: _____

Corrective Action: _____ **Date:** _____

Wildlife BMPs:

Comment: ECMC recieved a Form 42 Notice of Construction (doc #403794389) on 05/16/2024 stating that construction activities would commence on 05/21/2024. ECMC Staff emailed the Operator on 05/22/2024 requesting documentation of a pre-construction nesting migratory bird survey. Operator (M. Grimes) replied via email stating that the original survey was conducted March 2022 and re-evaluated via dektop November 2023. Additionally, M.Grimes stated that dirt work was halted on 05/22/2024 and the location would be re-surveyed for nesting migratory birds on 05/23/2024. The Operator also stated that construction did not commence until 05/22/2024. A wildlife survey was conducted and submitted on a Form 4 Sundry on 05/23/2024 (doc #403801768). The Operator failed to perform a pre-construction nesting migratory bird survey prior to commencing construction activities, in violation of Rule 1202.a.(8)

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: 451646 Type: LOCATION API Number: - Status: AC Insp. Status: CI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: IRRIGATED

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____ In _____

Comment [See ECMC/Inspector Comments Section at the end of this inspection report.](#)

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment [See ECMC/Inspector Comments Section at the end of this inspection report.](#)

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment [See ECMC/Inspector Comments Section at the end of this inspection report.](#)

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: IRRIGATED, RESIDENTIAL _____

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 Multi-Well Location

Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: The Operator is in the process of installing temporary BMPs (ditch and berm) around the entire perimeter during the construction phase of the location expansion. The existing production areas are experiencing erosion degradation throughout with evidence of riling and sediment deposition. Stormwater control measures (e.g. wattles) do not appear to be adequate as they are beginning to degrade, fill with sediment or both. Additional maintenance/repair is required on the active production side of the location.</p>						Date: 05/29/2024
<p>Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

ECMC Comments		
Comment	User	Date
Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices.	edwardsond	05/24/2024
<p>1002.c Protection of Soils Comment:</p> <p>This location does not comply with Reclamation rules. Rule 1002.c. states 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. The existing topsoil stockpile has significant weed cover - CO List C Noxious Weed - downy brome. The Operator is in the process of expanding the pad and moving the existing stockpile to the east of the disturbance area and will need to implement an active weed management program to comply with Rule 1002.c. This is being entered for documentation purpose at this time.</p>	edwardsond	05/24/2024
<p>1002.e Surface Disturbance Minimization Comments:</p> <p>Previous FIR (doc #709400070) conducted on 03/13/2023 documented that the Operator failed to perform interim reclamation to reduce disturbance areas only needed for production operations. The producing wells went onto production February 2022 and interim reclamation should have been completed by May 2022; at the time of the previous inspection, the location was documented as being over a year out of compliance. Operator submitted FIRR (doc #403353845; submitted 03/22/2023) stating that the location had an OGD in process for pad expansion that was filed in April 2022 with multiple amendments throughout the year. The amended Form 2A (doc #402991755) received completeness in February 2023 with a hearing date of 06/07/2023. The amended Form 2A was approved on 11/29/2023. At this time (May 2024) the location is approximately two years out of compliance as interim reclamation activities should have been completed by May 2022, however, the location is now being expanded under an approved and amended Form 2A. This is being entered for documentation purposes at this time.</p>	edwardsond	05/24/2024

<p>1002.b Soil Removal and Segregation Comment:</p> <p>Staff observed that construction activities had commenced but were not active at the time of this inspection. Staff estimates that the existing topsoil stockpile on the east end of the original disturbance area is approximately 10,100 CY. The Topsoil Protection Plan (doc #403030056) attached to the amended Form 2A (doc #402991755) states that approximately 11,480 CY of topsoil will be salvaged to a depth of six inches or maximum available as part of the pad expansion. Based on review of UC Davis Soil Web Survey, the proposed drilling pad expansion area falls within two soil units AsB and VoB with approximate topsoil depths of 12" (Ap + Bt1) and 23" (A+AB+Bt), respectively. The Operator has not provided any documentation of soil pit results or actual topsoil depths measured in the field within the Topsoil Protection Plan. The Operator shall ensure that all topsoil has been salvaged from the location in accordance with Rule 1002.b. A follow-up inspection will be performed at a later date to verify topsoil salvage requirements.</p>	<p>edwardsond</p>	<p>05/24/2024</p>
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Attached Documents

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

Document Num	Description	URL
708201275	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6561480