

**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:

08/22/2024

Submitted Date:

09/12/2024

Document Number:

696206212

**FIELD INSPECTION FORM**

Loc ID 436485 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:**

ECMC Operator Number: 10421  
Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP  
Address: 1110 SOUTH VINE STREET  
City: DENVER State: CO Zip: 80210

**Findings:**

- 16 Number of Comments
- 5 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 |
|-----------------|-------|----------------------------|---------|
| Fletcher, Kevin |       | kevin.fletcher@state.co.us |         |
| Neidel, Kris    |       | kris.neidel@state.co.us    |         |
|                 |       | chris@fieldinghillllc.com  |         |
|                 |       | hhill@fieldinghillllc.com  |         |
| Waldron, Emily  |       | emily.waldron@state.co.us  |         |
|                 |       | alex.fischer@state.co.us   |         |
| Maxwell, Logan  |       | logan.maxwell@state.co.us  |         |

**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|---------------|-------------|
| 436484      | WELL     | SI     | 03/01/2021  | OW         | 081-07799 | WPU-36-1V H2  | RI          |
| 436485      | LOCATION | AC     |             |            | -         | WPU-36 1      | RI          |

**General Comment:**

On 8/22/2024, Western Reclamation Work Lead Trujillo, Reclamation Specialist Maxwell and Location Assessment Specialist Fletcher conducted an inspection at Petroleum Resource Management Corp's WPU-36-1V #H2 Location in Moffat County, Colorado.

PRM representatives (Chris Cooper, John Carmony, Matt Cummings, J.D. Bush) were on site at time of inspection.

This inspection is a followup to #696205338 and 696205944 to document compliance with the following corrective actions:

- Weed Management
- Trash
- Spill cleanup
- Wildlife Protections
- Removal of unused riser equipment
- Management of E&P Waste
- Interim Reclamation
- Stormwater

This inspection is also in response to Resolution #403834814 stating Corrective Actions have been completed.

It was observed in this inspection that work to address the corrective actions have either not been performed, or has been insufficient.

Refer to the "Location", "Environmental", "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.

**Location**

Overall Good:

|                      |                   |       |  |
|----------------------|-------------------|-------|--|
| <b>Signs/Marker:</b> |                   |       |  |
| Type                 | OTHER             |       |  |
| Comment:             | Location entrance |       |  |
| Corrective Action:   |                   | Date: |  |
| Type                 | WELLHEAD          |       |  |
| Comment:             |                   |       |  |
| Corrective Action:   |                   | Date: |  |

|                           |              |       |       |
|---------------------------|--------------|-------|-------|
| Emergency Contact Number: |              |       |       |
| Comment:                  | 303-861-9480 |       |       |
| Corrective Action:        |              | Date: | _____ |

|                           |  |       |       |
|---------------------------|--|-------|-------|
| <b>Good Housekeeping:</b> |  |       |       |
| Type                      | TRASH  |       |       |
| Comment:                  | <p>Previous inspections observed trash debris (liner material) on the Location. Inspections required Operator to comply with 606 Rules.</p> <p>Trash debris appears to have been removed. This CA has been resolved.</p>                         |       |       |
| Corrective Action:        |  | Date: |       |
| Type                      | WEEDS  |       |       |
| Comment:                  | <p>See "Comment #1" at the end of this report.</p> <p>This corrective action has not been addressed and remains applicable.</p>  |       |       |
| Corrective Action:        | <p>CA per inspection #696205338:</p> <p>Comply with Rules 606.c and 1003.f. Keep Location free of all Undesirable Plant Species. Ongoing weed monitoring/management required until Location receives a passing Final Reclamation Inspection.</p> |       | Date: |

Overall Good:

|                |      |        |  |
|----------------|------|--------|--|
| <b>Spills:</b> |      |        |  |
| Type           | Area | Volume |  |

In Containment: No

Comment: Inspection #696205944 observed cement waste dumped within the stormwater outlet on the east end of the Location. Inspection required Operator to Clean and remediate spills to Table 915-1 cleanup concentrations. Comply with Rule 906 for the removal and proper disposal of non-E&P Waste. It was observed in this inspection that the cement waste appears to have been cleaned from the Location.

Inspection #696205944 observed stained soils throughout the Location. Inspection required Operator to Clean/remediate stained soils and spills to Table 915-1 cleanup concentrations. It was observed in this inspection that the stained soils have been cleaned/removed.

These CAs have been resolved.

Multiple Spills and Releases?

|                   |   |  |                 |
|-------------------|---|--|-----------------|
| <b>Equipment:</b> |   |  | corrective date |
| Type:             | #   |  |                 |
| Comment:          | See "Comment #2" at the end of this report. |  |                 |

|                    |   |       |  |
|--------------------|---|-------|--|
| Corrective Action: | <b>CA Per Inspection #696205338:</b><br><br>Abide by all 1100 series rules for flowline removal from service and abandonment;<br>remove flowline risers per 1100 and 1000 series rules.<br><br>This corrective action will remain applicable until risers have been removed.  | Date: |  |
| Type:              | #   |       |  |
| Comment:           | Inspection #696205944 observed that wildlife protection devices were missing from the open pipe riser equipment on the North end of the Location. Inspection required Operator to Cover/Cap or install other BMPs to prevent wildlife access to the pipe, including birds and bats.<br><br>It was observed in this inspection that the riser has been covered. This CA has been resolved. |       |  |
| Corrective Action: |   | Date: |  |

**Venting:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Flaring:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

**Inspected Facilities**

Facility ID: 436484 Type: WELL API Number: 081-07799 Status: SI Insp. Status: RI

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

Facility ID: 436485 Type: LOCATION API Number: - Status: AC Insp. Status: RI

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

**Environmental**

**Waste Management:**

| Type              | Management   | Condition  | GPS (Lat) | (Long) |
|-------------------|--|------------|-----------|--------|
| Drill Cuttings    |  | Inadequate |           |        |
| Comment           | See "Comment #5" at the end of this report   |            |           |        |
| Corrective Action | Comply with 905 Rules, Rule 902 and Rule 1002.f- Install containment measures to prevent the drill cutting material from migrating off-site, as well as from impacting stormwater runoff, and surface water. |            |           | Date:  |

**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: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_

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? Fail

Comment [Inspection #696205338 observed anchors on Location missing required marking.](#)  
[It was observed in this inspection that anchors have not been marked.](#)  
[This CA has nott be addressed and remains applicable.](#)

Corrective Action [Comply with Rule 1003.a and 603.j](#)

Date \_\_\_\_\_

1003b. Area no longer in use? Fail Production areas stabilized? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? Fail

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_  
 Cuttings management: Cuttings remain stored at toe of cut slope.

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? Fail  
 Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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? F

Comment

Corrective Action  Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND

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 <input type="checkbox"/> | Multi-Well Location <input type="checkbox"/> |                       |               |                          |             |
| <b>Storm Water:</b>   |  |  |                       |               |                          |             |
| Loc Erosion BMPs  | BMP Maintenance  | Lease Road Erosion BMPs                      | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment     |
|   |  |  |                       |               |                          |             |
| Comment: <a href="#">See "Comment #4" at the end of this report for comments regarding stormwater.</a>  |  |  |                       |               |                          | Date: _____ |
| Corrective Action: <b>Comply with Rule 1002.f- Install or repair required stormwater and erosion control measures to minimize erosion, degradation and sediment transport. Ensure BMPs are implemented in accordance with good engineering practices, and maintained in proper functioning condition.</b> |  |  |                       |               |                          |             |
| Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT   |  |  |                       |               |                          |             |

| ECMC Comments   |            |            |
|---|------------|------------|
| Comment   | User       | Date       |
| <p><b>COMMENT #5</b></p> <p>Previous inspections observed that drill cutting materials remain stored along the cut slope on the south end of the working pad surface. Inspections also documented that containment measures to ensure that the impacted, E&amp;P waste are properly contained have not been installed, resulting in off-site migration of impacted material via stormwater into the Location's stormwater diversion ditch. Inspections required Operator to implement containment measures to prevent pollution of stormwater Runoff, Groundwater, and surface water.</p> <p>It was observed in this inspection that containment measures have not been implemented to prevent pollution of stormwater runoff, groundwater, and surface water.</p> <p>This CA has not been addressed and remains applicable.</p> <p>At time of inspection, Operator indicated using Silt Fence as a containment measure for the drill cuttings stockpiled on the Location; silt fence not sufficiently impervious and an inadequate BMP to be utilized as a containment measure for E&amp;P Waste. However, at time of inspection, Operator stated that the Drill Cuttings will be removed and disposed off-site. Implementation of adequate containment at the drill cuttings will remain a requirement until materials are removed and properly disposed.</p> | trujilloam | 09/12/2024 |
| <p><b>COMMENT #2</b></p> <p>Inspection #696205338 observed risers associated with production equipment (tanks/tank battery, separator equipment, etc...) that have been removed from the Location on the southern and western areas of the working pad surface; Flowlines/risers have not been properly capped/OOSLAT during abandonment; Equipment/Risers are abandoned and requires removal.</p> <p>Inspection required Operator to abide by all 1100 series rules for flowline removal from service and abandonment; remove flowline risers per 1100 and 1000 series rules.</p> <p>Inspection #696205944 observed that the risers have been capped, however the unused flowline equipment have not been removed.</p> <p>It was observed in this inspection that the unused riser equipment has not been removed from the Location.</p> <p>This CA has not been addressed and remains applicable.</p>   | trujilloam | 09/11/2024 |

|  |                   |                   |
|--|-------------------|-------------------|
| <p><b>COMMENT #1</b></p> <p>Inspection #696205338 dated 10/18/2023 observed Undesirable Plant Species (Bull thistle, Canada thistle, Houndstongue) established on the Location. Inspection required Operator to comply with Rule 606.c and 1003.f.</p> <p>Inspection #696205944 dated 6/26/2024 observed that weed management efforts have not been performed, resulting in the continued spread and establishment of Undesirable Plant Species.</p> <p>Operator submitted Resolution #403834814 stating CA Completed; specifically, Operator states "Weed spraying was conducted the week of July 01 2024 for all areas not subject to seeding in Fall 2023. Weed monitoring/management will continue and a second round of weed spraying will be conducted in Fall 2024 for all areas of Location to maintain undesirable plant species".</p> <p>It was observed in this inspection that Weed Management efforts have either not been performed, or have been inadequate; ongoing weed monitoring/management is not occurring. Undesirable and Noxious Plant Species have continued to spread and establish on the Location, with the large majority of the Canada Thistle plants observed to have already matured, and were in the process of "seeding out" at time of inspection.</p> <p>Operator has failed to conduct adequate and ongoing weed management efforts to keep the Location free of all Undesirable Plant Species pursuant to Rule 606.c.</p>  | <p>trujilloam</p> | <p>09/11/2024</p> |
| <p><b>COMMENT #4</b></p> <p>Inspection #696205338 observed that stormwater and erosion control BMPs are missing or insufficient on the Location:</p> <p>-Slopes on the east and north end of the Location were observed to be bare; BMPs to stabilize the slopes, as well as to minimize erosion and degradation have not been implemented per good engineering practices. Control measures to allow for sediment laden-free stormwater discharge have not been implemented in conjunction with the outlet on the east end of the location; sediment laden stormwater was observed discharging from the working pad surface. Outlet does not appear to have been lined with geotextile material in conjunction with the rip-rap armoring; stormwater degradation to the walls of the outlet observed. Stormwater diversion ditch along the eastern perimeter of the Location has been designed in such a manner that will discharge stormwater into an irrigation ditch, potentially impacting Waters of the State. Inspection required Operator to comply with Rule 1002.f by 10/18/2023</p> <p>Inspection #696205944 observed that work to address the compliance issues were not performed, or has been inadequate.</p> <p>It was observed in this inspection that work to address the compliance issues were not performed, or has been inadequate.</p> <p>-Slopes on the north end of the Location remain predominantly bare; Operator has since stacked a 2nd erosion log on top of the wattles previously placed, however, BMPs to minimize erosion and degradation at the slope not been implemented. Outlets on the north and east end of the Location have not been installed or maintained per good engineering practice; geotextile lining in conjunction with multiangular rip-rap material has not been implemented per good engineering practice; stormwater degradation to the walls of the outlets has persisted.</p> | <p>trujilloam</p> | <p>09/11/2024</p> |

|  |                   |                   |
|--|-------------------|-------------------|
| <p><b>COMMENT #3</b></p> <p>Pursuant to Rule 1003.b, all disturbed areas affected by drilling or subsequent operations, except areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable. Interim reclamation shall occur no later than three six (6) months on non-crop land after such operations.</p> <p>Records show that the Location was constructed in 2015 with only 1 well permitted on the site; pursuant to Form 5(A) 401530567, the well was completed and went into production on 10/25/2017. Pursuant to Rule 1003.b, Interim Reclamation was required to be completed by 10/25/2018.</p> <p>Inspection #696205338 dated 10/26/2023 observed that, with exception to the well, all other production equipment associated with the well has been removed from the Location; areas on the northeast/east, south and west ends of the Location are no longer necessary for production, and subject to 1003 reclamation requirements. Inspection required Operator to comply with Rule 1003.b and conduct interim reclamation on areas no longer in use by 10/18/2023.</p> <p>Reclamation staff conducted a followup inspection (#696205944) on 6/26/2024, and observed that work to comply with Rule 1003.b had not been performed.</p> <p>It was observed in this inspection that the Location remains out of compliance with 1003 Requirements, and reclamation of areas not necessary for production has not been performed.</p> <p>It is noted that Operator submitted docket #240800186 requesting a 502 variance to Rule 1003.b for delayed Operations; the variance request is currently pending Hearings and a decision by the Commission. Initial reviews by ECMC Staff note that this is an incomplete variance request pursuant to the January 5, 2017 "Interim Reclamation Procedures for Delayed Operations" NTO. Be advised- a submission for a variance request does not guarantee approval; corrective action(s) and action date(s) would remain applicable until resolved if request is denied. Additionally, approval of a variance does not absolve the operator from possible enforcement action due to past non-compliance of the reclamation rules.</p> | <p>trujilloam</p> | <p>09/11/2024</p> |
|--|-------------------|-------------------|

**Attached Documents**

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 696206214    | Inspection Photos | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6704014">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6704014</a> |