

**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 FORMLoc ID 436485 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 10421

Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP

Address: 1110 SOUTH VINE STREET

City: DENVER State: CO Zip: 80210

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

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.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	Location entrance		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 303-861-9480

Corrective Action:

Date: _____

Good Housekeeping:

Type	TRASH		
Comment:	Previous inspections observed trash debris (liner material) on the Location. Inspections required Operator to comply with 606 Rules. Trash debris appears to have been removed. This CA has been resolved.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	See "Comment #1" at the end of this report. This corrective action has not been addressed and remains applicable.		
Corrective Action:	CA per inspection #696205338: 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.	Date:	

Overall Good: ☐

Spills:			
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?

Equipment:			corrective date
Type:	#		
Comment:	See "Comment #2" at the end of this report.		

Corrective Action:		CA Per Inspection #696205338:		Date:	
		Abide by all 1100 series rules for flowline removal from service and abandonment; remove flowline risers per 1100 and 1000 series rules.			
		This corrective action will remain applicable until risers have been removed.			
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.			
		It was observed in this inspcetion that the riser has been covered. This CA has been resolved.			
Corrective Action:				Date:	
<u>Venting:</u>					
Yes/No					
Comment:					
Corrective Action:				Date:	
<u>Flaring:</u>					
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 not been 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 REVEGETATIONCropland

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? FComment See "Good Housekeeping" regarding weed management.See "Comment #3" at the end of this report for comments regarding interim reclamation.

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"/>		
Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment:		See "Comment #4" at the end of this report for comments regarding stormwater.				Date: _____
Corrective Action:		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.				
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

ECMC Comments		
Comment	User	Date
<p>COMMENT #5</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&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&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>COMMENT #2</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>COMMENT #1</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>	trujilloam	09/11/2024	
<p>COMMENT #4</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>	trujilloam	09/11/2024	

COMMENT #3

trujilloam

09/11/2024

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.

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.

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.

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.

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.

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.

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	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6704014