

**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:

10/16/2024

Submitted Date:

10/24/2024

Document Number:

708201701**FIELD INSPECTION FORM**Loc ID 460271 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10694Name of Operator: PROVIDENCE OPERATING LLC DBA POCOAddress: 16400 DALLAS PARKWAY SUITE 400City: DALLAS State: TX Zip: 75428**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**11 Number of Comments3 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
Grimes, Meghan		mgrimes@providence-energy.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
460271	LOCATION	AC			-	Double J 35-11 Pad	CI

**General Comment:**

This is a Construction and Stormwater Inspection in response to Form 42 Notice of Construction (doc #403933635).

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	TRASH		
Comment:	Trash and debris was observed throughout the location. Refer to inspection photos for examples.  Operator shall comply with Rule 606 to remove all trash/debris from location.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	It appears that portions of the location were managed with herbicide for undesirable vegetation (e.g. russian thistle and kochia). However, during this inspection it was observed that canada thistle (CO List B Noxious Weed) and kochia were growing throughout other portions location.  Operator shall Comply with Rule 606 and manage noxious/undesirable vegetation throughout the entire location.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Stained soils were observed throughout the location. Refer to inspection photos for examples.  Properly dispose of oily waste in accordance with Rule 905.e.		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type:	#		corrective date
Comment:	No bull plug observed at loadout line. Refer to attached inspection photos.  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.		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
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Comment:			
Corrective Action:		Date:	

**Location Construction**

Location ID: 460271 CDP: \_\_\_\_\_

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

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

**Form 2A COAs:**

**Comment:** At the time of this inspection, Staff did not observe a copy of the approved Form 2A posted on location. ECMC Staff notified on-site pumper to inform of the requirement to post the Form 2A on location. Operator shall comply with Rule 406.c.

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

**Wildlife BMPs:****Comment:** \_\_\_\_\_

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:	460271	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: DRY LAND

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

**1002 SITE PREPARATION AND STABILIZATION**

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

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment

It does not appear that this location is in compliance with Rule 1002.b(1). Based on field observations during this inspection, it does not appear that all topsoil has been salvaged from the access roads and the location. Topsoil quantities stockpiled on the eastern portion of the disturbance area do not appear reflective of the total salvage area (e.g. location and access road). Refer to attached inspection photos.

Corrective Action

Refer to ECMC Comments Section at the end of this Field Inspection Report for Corrective Action information.

Date 11/24/20241002c. PROTECTION OF SOILS Fail

Comment

It does not appear that this location is in compliance with Rule 1002.c. 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.

Topsoil stockpile has significant weed cover (russian thistle and kochia) with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth. Refer to attached inspection photos.

Corrective Action

Best management practices to prevent weed establishment shall be implemented. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted.

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 Operator shall comply with interim reclamation timing requirements.

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

Date \_\_\_\_\_

**Overall Interim Reclamation****Final Reclamation/ Abandoned Location:**

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

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

Final Land Use: DRY LAND \_\_\_\_\_

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:	<p>This location does not comply with Rule 1002.f. During this inspection, it was observed that an unknown fluid was originating from a motor/pump near one of the wellheads. Additionally, debris from within one of the day tank secondary containments was observed on the drilling pad; the debris appeared to have been mixed with the unknown contents in the secondary containment. Refer to attached inspection photos.</p>					Date: 10/26/2024
Corrective Action:	<p>At the time of this inspection, ECMC Staff notified on-site Pumper to inform of the motor/pump skid fluid and secondary containment (day tank) debris that appeared to have been mixed with day tank contents.</p> <p>Comply with Rule 1002.f.(2)B. Implement or modify BMPs for improved material handling and spill prevention. Operator shall report contents from the pump/motor skid and from the secondary containment and include detail within the FIRR.</p>					
Pits:	<input type="checkbox"/> NO SURFACE INDICATION OF PIT					

**ECMC Comments**

Comment	User	Date
<p><b>Rule 1002.b.(2) Corrective Actions:</b></p> <p>Operator shall provide documentation of topsoil salvage activities that occurred during initial location construction and document topsoil quantities/volumes currently stockpiled on location. Include cubic yard (CY) estimates, depth of salvage and maps of where topsoil was salvaged.</p> <p>Operator shall conduct a topsoil analysis, using adjacent reference areas, to estimate topsoil depth. Operator shall report where topsoil samples were taken by overlaying sample points onto aerial imagery. Operator shall include photos of the soil samples. Discrete soil samples shall be taken at 6" intervals and to a minimum depth of 18".</p> <p>Operator shall report the following soil chemical and physical properties from each sample including, at a minimum: depth, pH Saturated Paste, electrical conductivity, organic matter (Walkely-Black method), nitrate nitrogen (AD-DTPA), phosphorus (AD-DTPA), potassium (AD-DTPA), zinc (AD-DTPA), iron (AD-DTPA), manganese (AD-DTPA), copper (AD-DTPA), lime, percent calcium carbonate equivalency (gravimetric), SAR, and texture estimates (hydrometer with textures reported as USDA).</p> <p>Operator shall conduct the topsoil analysis before frozen soil conditions.</p> <p>Operator shall submit the topsoil analysis using the required Field Inspection Report Resolution form and attach any relevant or supporting documents.</p>	edwardsond	10/24/2024

**Attached Documents**

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

Document Num	Description	URL
708201745	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6759607">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6759607</a>