

**FORM
INSP**

Rev
X/15

**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:

03/15/2019

Submitted Date:

03/18/2019

Document Number:

697300017

FIELD INSPECTION FORM

Loc ID _____ Inspector Name: Graber, Candice (Nikki) 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:

OGCC Operator Number: 69175
Name of Operator: PDC ENERGY INC
Address: 1775 SHERMAN STREET - STE 3000
City: DENVER State: CO Zip: 80203

Findings:

- 6 Number of Comments
- 2 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 |
|------------------|-------|--------------------------|---------|
| Liesenfeld, Zack | | Zack.Liesenfeld@pdce.com | |
| Inspections, All | | cogccinspection@pdce.com | |

General Comment:

This is an environmental inspection. Any corrective actions from previous inspections that have not been addressed are still applicable. Photos attached to document site condition at the time of inspection. PDC and COGCC personnel met on site on 3/15/2019 discuss the environmental response to windblown bentonitic based cuttings being transported from the Ludwig #3 Spreadfield to the neighboring agricultural property and agricultural ditch (not flowing) on the south side of the facility. The incident occurred during severe weather on 3/13/2019; the landowner had discovered the spill on the morning of 3/15/2019. Further detail provided in Spills/Releases section.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good:

Spills:

| Type | Area | Volume | | |
|------|------|--------|--|--|
| | | | | |

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

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

Flaring:

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

Environmental

Spills/Releases:

Type of Spill: DRILLING CUTTINGS

Estimated Spill Volume: _____

Comment: Windblown deposits were observed up to the center pivot sprinkler, approximately 1,000' feet south of the facility. Deposits were thin (between 0.5"-1" in thickness) and sporadically deposited in low lying areas. Landowner to the south was primarily concerned with preventing recurrence; he stated that he did not want equipment on the field recovering the material due to potential crop damage. A sample was taken from an area displaying the highest impact within the Speer Canal and will be analyzed for compliance with Table 910-1. PCD was attempting to contact Speer Canal board members at the time of inspection. Cleanup pending landowner permission. Two initial Form 19's have been submitted; one for impacts to landowner to the south (Doc #401975291) and one for impacts to canal (Doc #401975311). Proposed sampling plans will be defined pending analytical of sample taken from the canal.

Corrective Action: Two initial Form 19's have been submitted; one for impacts to landowner to the south (Doc #401975291) and one for impacts to canal (Doc #401975311). Proposed sampling plans will be defined pending analytical of sample taken from the canal. All spill cleanup shall comply with Rule 906.a.

Date: 04/15/2019

Reportable: YES

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

| Type | Management | Condition | GPS (Lat) | (Long) |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|-------------------------|
| Drill Cuttings | Land Application | Inadequate | | |
| Comment | During severe weather on 3/13/2019 bentonitic based cuttings were blown off the location and onto neighboring properties. PDC intends to begin site stabilization on 3/18/2019. PDC environmental indicated that the site is in active stormwater inspections and agreed to inspect weekly until disturbed area is stabilized. | | | |
| Corrective Action | Site stabilization shall include, at a minimum, crimp and straw on disturbed areas. Install or repair required BMPs per Rule 1002.f. | | | Date: <u>04/15/2019</u> |

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: 04/15/2019

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

COGCC Comments

| Comment | User | Date |
|--------------------------------------------------------------------------------------------------------------------------------------|---------|------------|
| COGCC will monitor cleanup and stabilization activities which are scheduled to begin on 3/18/2019. | graberc | 03/18/2019 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 697300018 | Site Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4766112 |