

**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:

07/10/2019

Submitted Date:

07/11/2019

Document Number:

696200381**FIELD INSPECTION FORM**Loc ID 313705 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10203Name of Operator: BLACK RAVEN ENERGY INCAddress: 165 S UNION BLVD SUITE 410City: LAKEWOOD State: CO Zip: 80228**Status Summary:**

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

Findings:3 Number of Comments1 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
		gwehrer@passcreekresource.com	
Arthur, Denise		denise.arthur@state.co.us	
Gillette, Kira		kira.gillette@state.co.us	
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Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
224907	WELL	PA	03/18/2013	DA	087-05300	CRONE, B F 4	RI

General Comment:

This is a follow-up final reclamation and stormwater inspection.

This inspection is to document compliance for the following corrective actions:

-Conduct final reclamation in accordance with COGCC Rule 1004.a including on the well location and facility.

-Noxious Weed Management

COGCC Inspection Report Summary

On Wednesday, 7/10/2019, Reclamation Specialist Trujillo conducted a follow-up reclamation inspection at PCR Operating LLC's Crone location #313705 in Morgan County Colorado.

During this inspection the following possible compliance issues were observed:

-No evidence that any additional reclamation has been conducted on the location in accordance with 1004.a

-Tanks north of the location have not been removed and area reclaimed. No documentation submitted regarding tanks.

-Noxious weed management

Refer to the attached photo documentation of observed compliance issue.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

Inspected Facilities				
Facility ID: 224907	Type: WELL	API Number: 087-05300	Status: PA	Insp. Status: RI

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Reclamation - Storm Water - Pit**Interim Reclamation:**

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

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

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? _____

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 REVEGETATIONCropland

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: _____

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 **Fail** _____ Locations, facilities, roads, recontoured _____

Compaction alleviation **Fail** _____ Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** _____ Cropland: perennial forage _____

Weeds present **Fail** _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: [SEE "COGCC COMMENTS" FOR COMMENT REGARDING RECLAMATION](#)

Corrective Action: _____ Date **03/01/2019**

Conduct weed management and perform reclamation in accordance with COGCC 1000 series rules including, but not limited to, removal of concrete pump base, tanks at facility, and any remaining surface equipment and debris, compaction alleviation and establish vegetation with total perennial, noninvasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. Revegetation activities shall be completed no later than 3/1/2019.

Overall Final Reclamation

Fail

Well Release on Active Location ☐Multi-Well Location ☐**COGCC Comments**

Comment	User	Date
RECLAMATION COMMENT	trujilloam	07/11/2019
Inspection #682504409 documented a pump base remaining on the location, and that location remained predominantly undesirable weedy plant species or exposed soil. Inspection required operator to conduct reclamation in accordance with 1004.a.		
Inspection #696200044 documented that the pump base has been removed, however, unable to find evidence that reclamation including, but not limited to, seeding/revegetation activities have been conducted and stabilization controls implemented to stabilize the seeded soil per 1000 series rules and corrective action. Additionally it was documented that Operator appears to have only removed pump base and filled with soil. Inspections required operator to conduct final reclamation activities.		
Previous inspections documented that the location remained predominantly undesirable weedy plant species including noxious weeds (Canada and Scotch thistle). Operator was required to conduct noxious weed management.		
Previous inspections required Oil and Gas tanks north of the location to be removed and area reclaimed. Operator indicated tanks belonged to surface owner. The COGCC directed operator to submit factual review/surface owner letter claiming ownership.		
Unable to find evidence that seeding/revegetation activities have been conducted and stabilization controls implemented to stabilize the seeded soil per 1000 series rules and corrective action. Location remains bare soil or predominantly undesirable weedy plant species not reflective of the adjacent reference areas.		
Unable to find evidence that sufficient and ongoing noxious weed management is occurring. Noxious weeds (Canada and Scotch thistle) remain evident on location. It is noted that a majority of the plants observed appear to have already matured and dispersed their seeds. Tanks north of the location have not been removed. Operator has not submitted documentation from surface owner.		
Original corrective action and date remain applicable.		

Attached Documents

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

Document Num	Description	URL
696200382	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875915