

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10203
Name of Operator: BLACK RAVEN ENERGY INC
Address: 165 S UNION BLVD SUITE 410
City: LAKEWOOD State: CO Zip: 80228

Findings:

- 3 Number of Comments
- 1 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	
		dkunovic@passcreekresource.com	
		dnr_cogccenforcement@state.co.us	
Gillette, Kira		kira.gillette@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

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

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 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

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:

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
<p>RECLAMATION COMMENT</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Original corrective action and date remain applicable.</p>	trujilloam	07/11/2019

Attached Documents

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

Document Num	Description	URL
402105543	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875925
696200382	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4875915