

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
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Document Number:  
402414519

Date Received:  
06/05/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

6 of 6 CAs from the FIR responded to on this Form

6 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10421  
Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP.  
Address: 1580 LINCOLN ST., STE 635  
City: DENVER State: CO Zip: 80203  
Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>John Carmony</u>	<u>(303) 489-3277</u>	<u>jcar75@msn.com</u>
<u>Rick Obernolte</u>	<u>(303) 660-9633</u>	<u>rickobe1@aol.com</u>
<u>Duncan Shepherd</u>	<u>(303) 861-9480</u>	<u>petromgt@comcast.net</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 692401343  
Inspection Date: 09/12/2019 FIR Submit Date: 09/16/2019 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: PETROLEUM RESOURCE MANAGEMENT CORP. Company Number: 10421  
Address: 1580 LINCOLN ST., STE 635  
City: DENVER State: CO Zip: 80203

LOCATION - Location ID: 436485

Location Name: Duncan Ranch Number: 11-89-36 #3-4 County: \_\_\_\_\_  
Qtrqtr: Lot 19 Sec: 36 Twp: 11N Range: 89W Meridian: 6  
Latitude: 40.860331 Longitude: -107.325012

FACILITY - API Number: 05-081-00 Facility ID: 436485

Facility Name: Duncan Ranch Number: 11-89-36 #3-4  
Qtrqtr: Lot 19 Sec: 36 Twp: 11N Range: 89W Meridian: 6  
Latitude: 40.860331 Longitude: -107.325012

CORRECTIVE ACTIONS:

1 CA# 130617

Corrective Action: Reclaim Location for Interim Reclamation per COGCC 1003 Series Rules; installing Reclamation in areas no longer needed for Use, Production. Install appropriate BMPs to Stabilize Areas until Vegetation establishes.

Date: 06/01/2020

Response: CA COMPLETED

Date of Completion: 06/05/2020

Operator Comment: The facility is being constructed; please see comments for CA#1. COGCC Rule 1003b states that interim reclamation of areas not needed for production operations must be commenced within 12 months. The well pad is currently undergoing construction for installation of the production facilities. No disturbance has occurred outside of the Form 2A disturbance limits. The cut and fill slopes are vegetated, remain stabilized, and have erosion control features that are regularly inspected and repaired as needed. The annual weed control program consists of an early summer/late spring herbicide application (done in June after the snow melt) and a late summer/early fall herbicide application (applied after the first freeze for maximum effect). The early application is responsible for the dead/stressed weeds observed in the photographs.

200326: Interim reclamation has taken place. The cut slope and fill slope both have established vegetation and are stabilized. Please see attached photographs P1, P2, P3 and P4.

200605 1: CA# 130617 related to 1003 Series rules and interim reclamation – A sundry notice has been submitted (COGCC Document 402414478) to update the interim reclamation plan and BMPs following the completion of construction of the new production facilities. All disturbed areas affected by drilling and subsequent production operations have been reclaimed, vegetative cover has been established, and the regular stormwater inspections show that the site is stable. Interim reclamation has been completed and site monitoring and maintenance will continue.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

**2** CA# 130618

Corrective Action: Monitor Pad Conditions; installing or repairing required BMPs per Rule 1002 f.

Date: 09/30/2019

Response: CA COMPLETED

Date of Completion: 11/01/2019

Operator Comment: The facility is being constructed; please see comments for CA#1. The production facility is being constructed and equipment/supplies are arriving almost daily. The heavy equipment is preparing the location of the tank batteries and moving the vessels and tanks to their temporary storage location on the well pad. All "degradation" is limited to the interior surface of the well pad within the intact storm water containment structures as seen in photos #1-3 and 10-11. The well site is inspected and monitored regularly by local field personnel and all potential issues are addressed immediately.

200326: Construction was completed and all facilities were in place by November 1, 2019. All BMPs were maintained as soon as possible during construction and have been maintained throughout the production operation startup and operations.

200605: 2: CA# 130618 related to Rule 1002 f – stormwater inspections are conducted as required and the site is inspected and maintained regularly by local field personnel who are instructed to address all potential issues immediately. Records are kept of the inspections and maintenance.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

**3** CA# 131290

Corrective Action: Comply with Rule 603.f.; removing unused equipment within 30 days; Tanks have 90 days to be removed.

Date: 10/16/2019

Response: CA COMPLETED

Date of Completion: 11/01/2019

Operator Comment: Unfortunately there is no "Basis for Review" category to fit our situation and the recommendation by Margaret Ash was to choose the option stating "Action requested was already completed prior to the inspection." The facility is being constructed and there is no unused or discarded equipment on the location. Packing material (pallets, plastic and cardboard materials, etc.) and the old secondary containment liners are being accumulated for disposal at a permitted disposal facility. Once the remainder of the secondary containment liners are removed all of this liner material will be disposed at a permitted disposal facility. Construction started on August 8, 2019 and completion is planned for September 27, 2019. Bolton Construction, LLC is the contractor. The equipment is being stacked and unpacked on site as it arrives. It is being assembled following standard setup procedures for production of the WPU-36-1V-H2 well (05-081-07799-02). Discussion of the photographs submitted by the COGCC inspector: Photograph #1 shows the well site sign and the overall layout of the temporary storage areas - tanks and equipment. Photographs #2 & 3 show the stabilized topsoil stockpile and vegetated slopes around the well pad. Photograph #4 shows some of the stored equipment with the stack of pallets and old tank battery lines that will be hauled away once construction is complete. Photo #5 shows some of the old storage tank liner that has been removed so far. It will be hauled to a permitted disposal facility at the end of construction. The catwalk and equipment in the background will be used in the new facility. Photo #6 shows more of the stockpiled equipment with the plastic wrap and containers that housed some

of it which will be hauled to a permitted disposal facility. Photo#7 shows the tubing that was used in the old tank battery and will be used again for the overhead tank vent lines. Photo#8 shows the wellhead; please note the lack of any visible oil sheen. All oil drippings are cleaned up and disposed at a permitted disposal facility as a part of the operator's regular housekeeping efforts. Photo #9 shows the old tank battery used for testing the well earlier this year. The oil staining is contained by an impermeable barrier and has been cleaned up since the inspection. Photos # 10 and 11 show some rutting on the well pad surface caused by the heavy machinery moving the equipment around.

There are 8 new storage tanks and 3 existing storage tanks on site for the new production facility. Additional production equipment includes an enclosed flare/combustor stack, a gas meter, a scrubber separator, a heater-treater, fluid-water knock out unit, tubing for overhead vapor recovery lines, valves and controls, and the equipment pallets and packing materials. A facilities layout plat has been attached to this FIRR for reference.

200326: All trash was removed immediately once the site dried out after the rain storms and the facility construction was completed by November 1, 2020. Please see photographs P5 through P10 taken on October 14, 2019 during the stormwater inspection. There was not any unused equipment on site. All of the used and new equipment has been installed in the new production facility.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**4** CA# 131291

Corrective Action: Comply with Rule 603.f .

Date: 09/26/2019

Response: CA COMPLETED

Date of Completion: 11/01/2019

Operator Comment: The facility is being constructed; please see comments for CA#1. There is no unused, discarded equipment on the location. Construction started on August 8, 2019 and completion is planned for September 27, 2019. Bolton Construction, LLC is the contractor. The equipment is being stacked on site as it arrives and is being assembled following standard setup procedures for production of the WPU-36-1V-H2 well (05-081-07799-02).

200326: The operator has complied with Rule 603.f all along, no unsued or discarded equipment was ever on site.

200605: 4: CA# 131291 related to Rule 603.f – The construction of the production facility was completed in October 2019 and all unused or discarded equipment has been removed. Inspection for weeds and weed treatment is conducted annually by a third party contractor. The field personnel inspect the site and remove stained soils and trash following inspections.4: CA# 131291 related to Rule 603.f – The construction of the production facility was completed in October 2019 and all unused or discarded equipment has been removed. Inspection for weeds and weed treatment is conducted annually by a third party contractor. The field personnel inspect the site and remove stained soils and trash following inspections.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**5** CA# 131292

Corrective Action: Comply with Rule 603.f.  
Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. Control and contain spills/releases and clean up per Rule 906.a. Properly treat or dispose of oily waste in accordance with 907.e.

Date: 10/16/2019

Response: CA COMPLETED

Date of Completion: 11/01/2019

Operator Comment: What appears to be stained soil at the wellhead does not contain an oil sheen. The surface around the wellhead is actually a dark gray subsoil. Any stained soils are regularly removed by the operator and disposed at a permitted facility. All valves, pipes, and fittings have been secured and inspected at regular intervals and maintained in good mechanical condition per Rule 605.d. Minor leaks/spills are contained, cleaned up, and oily wastes are properly disposed in accordance with 907.e as they occur.

200326: All stained soils continue to be removed and disposed at a permitted facility as they appear.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

Corrective Action: Comply with Rule 603.f .  
Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d. Control and contain spills/releases and clean up per Rule 906.a. Properly treat or dispose of oily waste in accordance with 907.e

Date: 09/26/2019

Response: CA COMPLETED

Date of Completion: 11/01/2019

Operator Comment: The facility is being constructed; please see comments for CA#1. There are no decommissioned tanks or equipment on the site. The site is undergoing extensive construction. The tanks and equipment are being gathered and assembled on the well pad as they are received for construction of the production facilities. The staining as seen in photo #9 is contained and is being cleaned up as a normal part of the housekeeping measures as these three existing tanks are transitioned from the old facility and readied for the new facility.

200326: The facility construction was completed by November 1, 2019. All valves, pipes, and fittings are in good mechanical condition and are inspected daily during the production operations. The site is maintained in a clean condition and all spills/releases are cleaned up as they occur.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_**OPERATOR COMMENT AND SUBMITTAL**

Comment: I addressed CAs 1(130617), 2 (130618), and 4 (131291) based on the responses in FIRR 402352886. I kept getting error messages at validate/save and finally made them go away by addressing CAs 3, 5, and 6 with "corrective action completed" and putting in a date of November 1, 2019. Only CAs 1, 2, and 4 are currently "not approved".

Additional seeding was completed in early June to address some of the areas that did not produce sufficient vegetative cover last fall.

Earlier today Sundry Notice (402414478) was submitted for approval showing the revised interim reclamation plat.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Rick Obernolte

Signed: \_\_\_\_\_

Title: Agent

Date: 6/5/2020 2:27:40 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number	Description

Total Attach: 0 Files