

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402438165

Date Received:
07/06/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

3 of 3 CAs from the FIR responded to on this Form

3 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 69175

Name of Operator: PDC ENERGY INC

Address: 1775 SHERMAN STREET - STE 3000

City: DENVER State: CO Zip: 80203

Contact Name and Telephone:

Name:

Phone: () Fax: ()

Email:

Additional Operator Contact:

Contact Name	Phone	Email
Tyranny Bergin	970-313-5547	EHSCOGCCInspections@pdce.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 697501655

Inspection Date: 06/11/2020

FIR Submit Date: 06/23/2020

FIR Status:

Inspected Operator Information:

Company Name: PDC ENERGY INC

Company Number: 69175

Address: 1775 SHERMAN STREET - STE 3000

City: DENVER State: CO Zip: 80203

LOCATION - Location ID: 433548

Location Name: Phelps Number: 12-32NHZ County:

Qtrqr: SENE Sec: 32 Twp: 1N Range: 66W Meridian: 6

Latitude: 40.010114 Longitude: -104.792191

FACILITY - API Number: 05-123-00 Facility ID: 433548

Facility Name: Phelps Number: 12-32NHZ

Qtrqr: SENE Sec: 32 Twp: 1N Range: 66W Meridian: 6

Latitude: 40.010114 Longitude: -104.792191

CORRECTIVE ACTIONS:

1 CA# 139918

Corrective Action: Operator shall provide the results of the wetland delineation by July 6, 2020.

Date: 07/06/2020

Also, if a consultation with the Army Corps of Engineers is required and a plan is developed, Operator shall provide the plan by December 10, 2020. If no consultation or plan is developed with the Army Corps of Engineers, then PDC shall submit a wetland mitigation plan to COGCC by December 10, 2020.

Response: CA COMPLETED

Date of Completion: 07/01/2020

Attached is the requested Wetland Delineation Plan. CA complete.

Operator
Comment:

COGCC Decision: Approved via an AMI

COGCC Representative: Approved via an AMI of this FIR resolution acknowledges the document and attachments were received. Operator has completed the corrective action.

Please note COGCC staff is in disagreement with the following Wetland Delineation Findings:

- 1) The wetland source is not agriculturally fed and the wetlands in question are likely not "artificially irrigated areas" based off the Stiff Diagram results from the Environmental Field Inspection Report Doc.# 689501054. In addition, the culvert shown in Photograph 3 is not accurate. The photo only shows the terminus; the inlet of the culvert is blocked and directs irrigation water to the south, avoiding the wetland.
- 2) Based on the Great Plains 2016 Regional Wetland Plant List, wetland plants were not properly identified as the correct wetland indicator status rating.
- 3) Sample #3 was taken in a ditch, which appears to be a questionable sample location.

2  CA# 139919

Corrective Action: Per conversations on the phone and field, Operator shall submit a Reclamation Plan providing interim reclamation procedures performed (with dates), seed mix used, and a proposed weed management plan.

Date: 07/06/2020

Response: CA COMPLETED Date of Completion: 07/02/2020

Operator Comment: Attached is the requested Interim Reclamation Plan. CA complete.

COGCC Decision: **Not Approved**

COGCC Representative: Operator did not provide all the required information- see the below list. Operator shall re-submit the Reclamation Plan via Form 4 Sundry Notice.

- 1) Interim reclamation procedures performed
- 2) seed mix

Note: If the Operator considers Prairie dog management, there are other options, other than rodenticide, that could potentially mitigate the harming of other species.

3  CA# 139920

Corrective Action: Per conversations on the phone and field, Operator shall submit an engineered stamped Permanent Stormwater Plan, including how to manage any subsurface flows that backup onto location.

Date: 07/06/2020

Response: CA COMPLETED Date of Completion: 07/06/2020

Operator Comment: Per the phone conversation COGCC inspector Chris Binchus had with PDC Representative Meredith Knauf on 07/06/2020, PDC has been granted an extension on the Stormwater Plan that has been requested. We are awaiting the final extension timeline date decision. A stormwater plan has not been attached but CA complete.

COGCC Decision: Approved via an AMI

COGCC Representative: COGCC staff is granting the extension with conditions of approval. See Form 4 Sundry Notice Doc.# 402436411.

OPERATOR COMMENT AND SUBMITTAL

Comment: Attached is the requested Wetland Delineation Plan. Attached is the requested Interim Reclamation Plan. Per the phone conversation COGCC inspector Chris Binchus had with PDC Representative Meredith Knauf on 07/06/2020, PDC has been granted an extension on the Stormwater Plan that has been requested. We are awaiting the final extension timeline date decision. A stormwater plan has not been attached but CA's complete.

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

Print Name: Tyranny Bergin

Signed: _____

ATTACHMENT LIST

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

<u>Document Number</u>	<u>Description</u>
402438165	FIR RESOLUTION SUBMITTED
402438170	Phelps Pad Wetland Delineation Plan
402438176	Phelps Pad Interim Reclamation Plan
402438177	Read Receipt from Army Corps of Engineers

Total Attach: 4 Files