

**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:

09/30/2020

Submitted Date:

10/01/2020

Document Number:

700600162**FIELD INSPECTION FORM**
 Loc ID 324938 Inspector Name: Kosola, Jason On-Site Inspection ☐ 2A Doc Num:
Operator Information:

OGCC Operator Number: 10634

Name of Operator: P O & G OPERATING LLC

Address: 5847 SAN FELIPE SUITE 3200

City: HOUSTON State: TX Zip: 77057

Status Summary:

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

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
Binschus, Chris		chris.binschus@state.co.us	
Smith, Mel		mel_smith@pogresources.com	
Colotta, Wendy	281-620-1993	wendy_colotta@pogresources.com	Production & Regulatory Associate

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467381	SPILL OR RELEASE	AC	09/09/2019		-	SPILL/RELEASE POINT	AC

General Comment:

This is a follow up inspection to document status of spill cleanup and final reclamation. At the time of this inspection Operator has made no attempt to clean up historic spill or conduct surface reclamation of well pad. Original Corrective Action date of 2/28/2019 remains in effect. Operator is advised that COGCC Corrective Action dates are as enforceable as COGCC rules. Failure to comply with Corrective Actions will result in financial penalty. Operator should immediately begin remediation of spill.

On 8/28/2019, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at PO&G Operations Lowe B-2 location, and the Petx-Lowe 1-A facility location in Kit Carson County, Colorado. This inspection was in response to Sundry #402122863 submitted by PO&G stating Final reclamation complete, site ready for inspection in accordance with 1004.c. Reclamation inspector issued 4 Corrective Actions that have yet to be resolved. Operator should refer to inspection 696200704 and complete the required Corrective Actions.

On 12/12/2019 Environmental Protection Specialist (EPS) Kosola conducted a follow up inspection to document status of spill clean up in COGCC inspection 700600040. EPS requested that operator submit results from spill investigation on inspection and called operator to discuss. No response was received.

On 9/14/2020 EPS Kosola contacted PO&G via email and again requested that the operator submit the results from spill investigation. Operator submitted Form 19 Supplemental documenting that a spill investigation was conducted and found contaminated soil. Operator then requested closure of spill but no clean up of spill was conducted. Form 19 was then sent back to DRAFT.

Operator shall submit Form 19 Supplemental documenting spill investigation. If contamination was discovered and a clean up is required then operator shall submit a Form 27 Remediation Plan to Area EPS Kosola documenting plan to clean up.

After completion of remediation operator shall conduct final reclamation of well pad as described in COGCC inspection 696200704

Environmental**Spills/Releases:**

Type of Spill: OTHER E&P WASTE

Estimated Spill Volume: _____

Comment: COGCC Inspection 696200704 documented historic release of crude oil and E&P waste buried on location. Operator had attempted to close location with no clean up of spill or final reclamation of location. Operator submitted Form 19 Initial reporting spill on 9/5/2019 but no follow up has been submitted. No remediation has been conducted and no reclamation of location has been attempted.

Corrective Action: Submit completed Form 19 Supplemental documenting investigation into the delineation of historic release. Operator shall fill out all data fields in Form 19 as appropriate.

Date: 10/02/2020

Reportable: YES

GPS: Lat _____

Long _____

Proximity to Surface Water:

Depth to Ground Water:

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured _____

Compaction alleviation _____ 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 _____

Overall Final Reclamation **Fail** Well Release on Active Location ☐ Multi-Well Location ☐

Attached Documents

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

Document Num	Description	URL
700600166	Inspection photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260427