

**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:

09/18/2020

Submitted Date:

10/01/2020

Document Number:

700600160

FIELD INSPECTION FORMLoc ID 324936 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 |
|-----------------|--------------|--------------------------------|-----------------------------------|
| Colotta, Wendy | 281-620-1993 | wendy_colotta@pogresources.com | Production & Regulatory Associate |
| Binschus, Chris | | chris.binschus@state.co.us | |
| Smith, Mel | | mel_smith@pogresources.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------------------|--------|-------------|------------|-----------|---------------------|-------------|
| 213626 | WELL | PA | 11/28/2018 | OW | 063-06185 | PETX-LOWE 1A | PA |
| 467379 | 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 Petx-Lowe 1A location in Kit Carson County, Colorado. COGCC inspection 696200706 was in response to Sundry #402119982 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 696200706 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 700600036. 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.

| Inspected Facilities | | | | | | | | | |
|----------------------|--------|-------|----------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 213626 | Type: | WELL | API Number: | 063-06185 | Status: | PA | Insp. Status: | PA |
| | | | | | | | | | |
| Facility ID: | 467379 | Type: | SPILL OR | API Number: | - | Status: | AC | Insp. Status: | AC |
| | | | | | | | | | |

Environmental**Spills/Releases:**

Type of Spill: OTHER E&P WASTE

Estimated Spill Volume: _____

Comment: COGCC Inspection 696200706 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: _____

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

| Document Num | Description | URL |
|--------------|----------------------|---|
| 402501329 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260432 |
| 700600164 | Inspection photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260425 |