

**FORM
INSP**

Rev
X/20

**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:

03/28/2021

Submitted Date:

04/05/2021

Document Number:

697502738

FIELD INSPECTION FORM

Loc ID 442103 Inspector Name: Binschus, Chris On-Site Inspection 2A Doc Num: _____

Operator Information:

OGCC Operator Number: 69175
Name of Operator: PDC ENERGY INC
Address: 1775 SHERMAN STREET - STE 3000
City: DENVER State: CO Zip: 80203

Status Summary:

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

Findings:

- 8 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
		phillip.porter@pdce.com	
Adamczyk, Megan		megan.adamczyk@state.co.us	
		cogccinspection@pdce.com	ALL INSPECTIONS

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
442103	LOCATION	AC			-	Collins 4N64W18T	RI

General Comment:

[This inspection is in response to a reclamation complaint. Refer to the complaint and interim reclamation sections for more detail.](#)

Location Construction

Location ID: 442103 CDP: _____

Comment: Based on Google Earth aerial imagery from 9/7/2016, it appears a disturbance area of approximately 8.5 acres is in compliance with the approved Form 2A for the permitted disturbance area. It appears the MLVT was stored west of the interim reclamation area. Refer to the attached inspection photos.

Corrective Action: **Date:** _____

Form 2A COAs:

Comment:

Corrective Action: **Date:** _____

Wildlife BMPs:

Comment:

Corrective Action: **Date:** _____

Comment:

Corrective Action: **Date:** _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities

Facility ID: 442103 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Complaint

Comment: [Complaint #: 200449606](#)
[Field Inspector Assigned: Chris Binschus](#)
[Location ID#: 442103](#)
[Inspection Document #: 697502738](#)
 Nature of complaint: Complainant has concerns about contouring within the interim reclamation area and flood irrigation. Complainant has contacted PDC several times since interim reclamation was completed in 2016 to address contouring; however, PDC has failed to conduct any further interim reclamation activities.

Corrective Action:

Date:

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: IRRIGATED

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 ? Pass

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? Fail

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured Fail 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? F

Comment

Based on visual observations and drone technology, COGCC staff confirmed that interim reclamation areas have not been properly contoured to allow for successful flood irrigation. The southeastern property is outside of the irrigation circle and over half of the interim reclamation area requires flood irrigation. Since successful flood irrigation has not been achieved, vegetation throughout the interim reclamation area is not reflective of reference area vegetative levels. Some establishment of desirable perennial vegetation was observed within the interim reclamation areas; however, there were areas with mostly annual weedy vegetation. See COGCC comments for additional compliance info on interim reclamation requirements and drone info.

Corrective Action

Comply with Rule 1003 to properly contour interim reclamation areas to allow for successful flood irrigation. Upon completion of contouring to allow for successful flood irrigation, Operator shall treat and prevent invasion of undesirable species until interim reclamation areas comply with Rule 1003 vegetation standards.

Collaborate with the landowner to determine mitigating measures that will allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production.

Due to interim reclamation areas being out of compliance over 4 years, this location may be referred to Enforcement and therefore no corrective action date will be issued.

Date _____

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: IRRIGATED

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 _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ 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 _____ Well Release on Active Location Multi-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: At the time of this inspection, no stormwater erosion issues were observed at location.

Corrective Action: _____ Date: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
Photo 3: Drone aerial imagery illustrates a set of tools paired with a digital surface model used for measuring and understanding the elevation in 2D. Red coloration illustrates a higher elevation that decreases as you travel east to the blue coloration. The approximate elevation difference or drop in elevation from west to east is 30 feet.	binschusc	04/06/2021
The red circle south the wells is pointing out the low spot with a darker blue coloration. This area was identified as where irrigation water ponds up.		
If additional topsoil is imported, Operator shall perform soil testing to confirm the added soil material is equivalent to reference soils and will meet the growth requirements for an alfalfa/grass mix. Operator will have to provide agronomic soil properties and the source of topsoil to COGCC staff upon request.	binschusc	04/05/2021

Attached Documents

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

Document Num	Description	URL
402648949	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5394917
697502740	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5394916