

**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:

04/13/2021

Submitted Date:

04/14/2021

Document Number:

697502765**FIELD INSPECTION FORM**Loc ID 331561 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 69175Name of Operator: PDC ENERGY INCAddress: 1775 SHERMAN STREET - STE 3000City: DENVER State: CO Zip: 80203**Status Summary:**

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

Findings:7 Number of Comments2 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
,		cogccinspection@pdce.com	ALL INSPECTIONS
Adamczyk, Megan		megan.adamczyk@state.co.us	
		phillip.porter@pdce.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
263489	WELL	PA	03/21/2017	OW	123-20905	WYSCAVER 23-5	RI

General Comment:

This inspection is in response to a reclamation complaint. Refer to the complaint, final reclamation and stormwater sections for more detail.

This inspection is for the well location, access road and the associated offsite tank battery.

This well API#123-20905 was plugged and abandoned 03/21/2017. The associated offsite tank battery serviced three wells and the last well (API#123-21324) was plugged and abandoned 12/27/2018.

Inspected FacilitiesFacility ID: 263489 Type: WELL API Number: 123-20905 Status: PA Insp. Status: RI**Complaint**

Comment: [Complaint #: 200449628](#)
[Field Inspector Assigned: Chris Binschus](#)
[Location ID#: 331561](#)
[Inspection Document #: 697502765](#)
[Nature of complaint: Complainant has concerns about the lack of reclamation efforts regarding four well locations, the associated access roads and two tank batteries.](#)

Corrective Action:

Date:

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 Pass 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 Fail Locations, facilities, roads, recontoured Fail

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% Fail 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:

Well location, access road and associated offsite tank battery have little to no establishment of desirable plant species.

Reference area vegetation is comprised mostly of warm season grasses like Blue grama. Surface owner has planted other cool season and warm season species throughout his property.

The tank battery was shared with Noble. Noble's portion has been reclaimed, fenced off and remains in process. Wind erosion was observed at PDC's portion and has not been stabilized to minimize erosion, transport of sediment offsite and site degradation. The tank battery is classified as valent sand and vona loamy sand. Both are highly susceptible to wind erosion. Refer to the attached inspection photos.

Corrective Action:

Comply with Rule 1002.a.(3) and 1004. At the request of the surface owner, PDC shall fence off the well location, access road and associated offsite tank battery and maintain fence to prevent livestock entry until passing final reclamation. PDC shall collaborate with the surface owner on fencing requirements but it will likely be similar to Noble's fence at the shared tank battery.

PDC shall use an approved surface owner seed mix.

PDC shall perform final reclamation activities immediately.

This location may be referred to Enforcement and therefore no corrective action date will be issued.

Date _____

Overall Final Reclamation

Fail

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:

See the Final Reclamation section regarding wind erosion at the associated offsite tank battery.

Corrective Action:

PDC shall perform final reclamation activities immediately to stabilize the tank battery from further wind erosion.

Date: _____

Pits:

☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
Fencing- Operator had previously installed fencing to prevent livestock entry while final reclamation was in process. Surface owner stated that fencing was not sufficient and was not maintained to prevent livestock entry; therefore, fencing was taken down.	binschusc	04/14/2021
COGCC staff, Chris Binschus, contacted Operator representatives, Phillip Porter and Ray Meisner, on April 14, 2021 to discuss observations and required corrective actions.	binschusc	04/15/2021

Attached Documents

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

Document Num	Description	URL
402660054	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5404427
697502766	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5404423