

**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:

08/23/2022

Submitted Date:

08/26/2022

Document Number:

696204007

FIELD INSPECTION FORMLoc ID 322302 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10241

Name of Operator: PRE RESOURCES INC

Address: 1888 SHERMAN STREET #760

City: DENVER State: CO Zip: 80203

Status Summary:

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

Findings:

4 Number of Comments

2 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 |
|----------------|-------|---------------------------|---------|
| | | bvanblaricom@prellc.com | |
| | | trogers@prellc.com | |
| Arthur, Denise | | denise.arthur@state.co.us | |
| | | mchoury@prellc.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|-----------------------------------|-------------|
| 210206 | WELL | PA | 07/16/2016 | GW | 045-05108 | GOVERNMENT BUTTRAM 1 | RI |
| 322302 | LOCATION | CL | | | - | GOVERNMENT BUTTRAM-65S102W 30W2SW | RI |

General Comment:

On 8/25/2022, Reclamation Specialist Trujillo conducted a final reclamation inspection at PRE Resources Inc's Government Buttram 1 location in Garfield County, Colorado.

This inspection is a followup to #696203758 to document compliance with the following:
-1004.a- Final Reclamation

It was observed in this inspection that Location remains out of compliance with COGCC Rules and Corrective actions

Refer to the "Reclamation" and "Stormwater" section of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

| Inspected Facilities | | | | |
|----------------------|----------------|-----------------------|------------|------------------|
| Facility ID: 210206 | Type: WELL | API Number: 045-05108 | Status: PA | Insp. Status: RI |
| | | | | |
| Facility ID: 322302 | Type: LOCATION | API Number: - | Status: CL | Insp. Status: RI |
| | | | | |

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 **Fail**

Compaction alleviation **Fail** Dust and erosion control **Fail**

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: [See "Comment #1" under COGCC Comment](#)

Corrective Action: _____ Date **07/31/2022**

Comply with 1004 rules and conduct final reclamation of the Location including by not limited to compaction alleviation, recontouring and revegetating; conduct weed management and continue to monitor/manage Undesirable and Noxious plants to prevent further spread and establishment. Weed management is required until site receives a passing final reclamation inspection.

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: It was observed in this inspection that BMPs to control stormwater runoff in a manner that minimize erosion, sediment transport and site degradation are missing from the access road, and cut slopes of the Location; gully erosion evident.

Temporary stormwater and erosion controls required until final reclamation work is completed, at which point additional BMPs will be required to stabilize the seeded soils and reclamation areas.

Corrective Action: Comply with 1002.f; implement and maintain stormwater and erosion control BMPs in accordance with good engineering practices. Ongoing stormwater monitoring/management required until site receives a passing final reclamation inspection.

Date: 08/25/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

| Comment | User | Date |
|---|------------|------------|
| <p>COMMENT #1</p> <p>Inspection #696203758 observed that final reclamation has not been completed; Location and access road have not been decompacted, recontoured and reclaimed- Cut/fill slope remains evident and working pad has been left flat, secondary containment berms remain evident, gravel has not been removed; surface equipment (pipe) remaining on northwest end of the Location; Vegetation on Location is predominantly Undesirable and Noxious Plant Species including, but not limited to, Field Bindweed, Redstem filaree, Hoary Cress, etc... Inspections required Operator to comply with 1004 Rules.</p> <p>It was observed in this inspection that 1004 final reclamation work including, but not limited to, compaction alleviation, recontouring/regrading, revegetation and weed management has not been conducted. Erosion degradation also observed along cut slopes (see "Stormwater")</p> <p>CA has not been addressed and remains applicable</p> | trujilloam | 08/26/2022 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------------|---|
| 696204008 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5841141 |