

**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:

03/23/2023

Submitted Date:

03/29/2023

Document Number:

708200072

**FIELD INSPECTION FORM**

Loc ID: 324938      Inspector Name: Edwardson, Dylan      On-Site Inspection:       2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**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

**Findings:**

- 7 Number of Comments
- 3 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
MOORE, CHRISTOPHER	713-244-0779	christopher_moore@pogresources.com	Principal Agent
Kosola, Jason		jason.kosola@state.co.us	
EGGLESTON, RICK		rick_eggleson@pogresources.com	
RANDO, CHRIS		christopher_rando@pogresources.com	All Inspections
Waggoner, Kyle		kyle.waggoner@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
213633	WELL	PA	11/30/2018	OW	063-06192	LOWE B-2	RI
324938	LOCATION	CL			-	LOWE-611S46W 14NWNE	RI
463250	Location	CL			-	Petx-Lowe 1-A	RI

**General Comment:**

This is a Final Reclamation Inspection for PA Well API#063-06192 and its associated tank battery. Well was plugged and abandoned 11/30/2018. Any corrective actions from previous inspections that have not been addressed are still applicable.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	DEBRIS		
Comment:	Various trash/debris was observed throughout the location, including posts, barrel, plastic pipe, parts, etc). Refer to attached inspection photos for documentation.  This compliance issue was also documented in previous reclamation inspection (Doc #696200704) and does not appear to have been performed.		
Corrective Action:	Comply with Rule 606 and 1004.a to remove all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (11/30/2018) the associated facility. A corrective action date of 2/28/2019 is being provided as work should have been conducted by this date.	Date:	02/28/2019
Type	UNUSED EQUIPMENT		
Comment:	A riser and gas meter were observed on the east and southeast portions of the facility location and a barrel with white pvc pipe and posts were observed at the well location. All surface equipment was supposed to be removed three months after plugging. PO&G remains responsible for the management and removal of all oil and gas associated equipment on their locations. Riser will require removal in accordance to 1004.a. If riser is midstream, then it is the COGCC's expectation that PO&G will work the the midstream company to have the riser removed and the location reclaimed. Refer to attached inspection photos for documentation.		
Corrective Action:	Comply with Rule 1004.a. to remove (regardless of ownership) all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (11/30/2018) the associated facility. A corrective action date of 2/28/2019 is being provided as work should have been conducted by this date.	Date:	02/28/2019

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 213633 Type: WELL API Number: 063-06192 Status: PA Insp. Status: RI

Facility ID: 324938 Type: LOCATION API Number: - Status: CL Insp. Status: RI

Facility ID: 463250 Type: Location API Number: - Status: CL Insp. Status: RI

**Environmental**

**Spill/Remediation:**

Comment: Remediation Projects #16023 and #16019 are still active and open. Continue to comply with 900 series rules and regulations. Active remediation should not preclude the commencement of final reclamation activities.

Corrective Action:

Date: 04/01/2023

Emission Control Burner (ECB): \_\_\_\_\_

Comment:

Pilot: \_\_\_\_\_

Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**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 REVEGETATION

Cropland

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 Fail

Debris removed Fail No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded Fail Contoured Fail Culverts removed Fail

Gravel removed Fail

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

Compaction alleviation Fail Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% Fail Cropland: perennial forage \_\_\_\_\_

Weeds present Fail Subsidence Fail

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

Comment:

This location does not comply with Rule 1004. It does not appear any reclamation work has been performed since previous inspection (Doc #696200704) conducted on 08/28/2019. The well and facility locations have evidence of subsidence, gravel and road base, debris and trash, unused equipment, undesirable vegetation (e.g. kochia) and areas void of vegetation observed throughout. Additionally, the access roads have not been reclaimed to reflect reference areas. Refer to attached inspection photos for documentation and additional information.

Corrective Action:

Comply with 1004 rules; Conduct final reclamation including, but not limited to, removal of gravel/road base at well and facility location, removal of culverts at access road, compaction alleviation (cross-ripping to a minimum of 18 inches) at well location/access road/facility location, contour/grade and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Corrective action date is being back-dated to when corrective action should have been completed (See Doc #696200704).

Date **10/31/2019**

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
708200077	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6065851">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6065851</a>