

**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 FORMLoc ID 324938 Inspector Name: Edwardson, Dylan 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:**

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.

LocationOverall 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		
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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:	<u>213633</u>	Type:	<u>WELL</u>	API Number:	<u>063-06192</u>	Status:	<u>PA</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>324938</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>CL</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>463250</u>	Type:	<u>Location</u>	API Number:	<u>-</u>	Status:	<u>CL</u>	Insp. Status:	<u>RI</u>

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 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 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:

	<p>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.</p>	
Corrective Action:	<p>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).</p>	<p>Date 10/31/2019</p>
Overall Final Reclamation	Fail	<p>Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/></p>

Attached Documents

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

Document Num	Description	URL
708200077	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6065851