

**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:

06/21/2023

Submitted Date:

06/23/2023

Document Number:

696205045

**FIELD INSPECTION FORM**Loc 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	
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		mchoury@prellc.com	
		dnr_cogccenforcement@state.co.us	

**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 6/21/2023, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at PRE Resources Inc's Government Buttram 1 location in Garfield County, Colorado.

This is also a follow-up inspection to #696203758 dated 6/14/2022, #696204007 dated 8/23/2022, #696204441 dated 12/5/2022, and NOAV #403429381 to document compliance for the following corrective actions:

- Comply with 1004 Rules by 7/31/2022
- Comply with Rule 1002.f by 8/25/2022

It was observed in this inspection that the Location remains out of compliance with COGCC Rules, corrective actions, and NOAV corrective actions.

The following compliance issues were observed during this inspection:

Refer to the "Reclamation" and "Stormwater" sections 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 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 \_\_\_\_\_ 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 "Reclamation Comment" under COGCC Comments at the end of this report.](#)

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 pursuant to Rules 1004.e and 606.c.

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
	Fail		Fail			

Comment: Previous inspections observed 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. Inspection required Operator to comply with 1002.f, and the temporary BMPs are required until final reclamation work is completed, at which point additional BMPs will be required to stabilize the seeded soils and reclamation areas.

It was observed in this inspection that stormwater and erosion control BMPs remain missing or insufficient; unable to find evidence that work to address the CA was conducted; erosion degradation has persisted. Original CA and CA date remains applicable.

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><b>RECLAMATION COMMENT</b></p> <p>Inspection #696203758 dated 6/14/2022, #696204007 dated 8/23/2022, #696204441 dated 12/5/2022 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 by 7/31/2022.</p> <p>It was observed in this inspection that 1004 final reclamation work including, but not limited to, compaction alleviation, recontouring/regrading, and revegetation has not been conducted; weed management has not been performed, or has been inadequate; Undesirable and Noxious Plant Species has continued to establish and spread throughout the Location. Pipe remaining on the north end of the Location. Erosion degradation remains evident along cut slopes (see "Stormwater").</p> <p>Corrective actions have not been addressed and remain applicable.</p>	trujilloam	06/23/2023

**Attached Documents**

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

Document Num	Description	URL
696205046	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6158634">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6158634</a>