

**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:

10/18/2023

Submitted Date:

10/19/2023

Document Number:

696205338

FIELD INSPECTION FORMLoc ID 436485 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10421

Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP

Address: 1110 SOUTH VINE STREET

City: DENVER State: CO Zip: 80210

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

19 Number of Comments

13 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
		petromgt@comcast.net	
Fischer, Alex		alex.fischer@state.co.us	
Neidel, Kris		kris.neidel@state.co.us	
Burchett, Kirby		kirby.burchett@state.co.us	
Longworth, Mike		michael.longworth@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
436484	WELL	SI	03/01/2021	OW	081-07799	WPU-36-1V H2	RI
436485	LOCATION	AC			-	WPU-36 1	RI

General Comment:

On 10/18/2023, Northwest Reclamation Specialist Trujillo, and Reclamation Supervisor Dr. Arthur conducted an inspection at Petroleum Resource Management Corp's WPU-36-1V #H2 location in Moffat County, Colorado.

The following compliance issues were observed during this inspection:

- Undesirable Plant Species
- Stormwater
- Interim Reclamation
- Cuttings Management
- Closure of Facilities
- Unused Equipment
- Signage/Labeling Requirements
- Improperly capped loadout lines
- Inactive well requirements- Forms and Financial Assurance
- Cellar; wildlife and safety concerns
- Operational and Safety requirements

Refer to the "Location", "Environmental", "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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Location entrance		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Two tanks observed on the northeast end of the Location. Operator on site mentioned tanks were used to store oil during work to remove the tank battery facilities. Unclear if tanks contain fluids at time of inspection. Tanks currently lack any signage or labeling pursuant to 605 requirements.		
Corrective Action:	Comply with Rule 605.h	Date:	10/18/2023

Emergency Contact Number:

Comment:	303-861-9480	
Corrective Action:		Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Various unused equipment (tanks, pipe, etc...) observed stored on the north and eastern areas of the working pad surface.		
Corrective Action:	Comply with Rule 606 Rules	Date:	10/18/2023
Type	WEEDS		
Comment:	Undesirable Plant Species (Bull thistle, Canada thistle, Houndstongue- Designated Colorado State List B Noxious species) observed established along the fill slopes of the Location.		
Corrective Action:	Comply with Rules 606.c and 1003.f. Keep Location free of all Undesirable Plant Species. Ongoing weed monitoring/management required until Location receives a passing Final Reclamation Inspection.	Date:	10/18/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
Comment:	Stained soils/spills observed throughout the Location, including areas around the two tanks stored on the east end of the Location, and the pipeline on the north end of the Location.			
Corrective Action:	Clean/remediate stained soils and spills to Table 915-1 cleanup concentrations.			Date: 10/18/2023

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

Type: Other	#		corrective date
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Comment:		Production facilities have been removed from the Location. Previous inspections and aerial imagery identify a tank battery facility containing three (3) 500 bbl produced water tanks and eight (8) 400 bbl crude oil tanks; one (1) vertical heated separator; one (1) dehydrator; one (1) Gas Meter Run; and one (1) Emission Control Device previously existing on the Location.		
		Abandoned flowline risers remain on the Location.		
		Unable to find records that the Oil and Gas Facilities have been closed and decommissioned in accordance with 911 requirements.		
Corrective Action:		Operator shall submit a Form 27 per Rule 911 for the decommissioning of the tank battery facilities and production equipment.		Date: 10/18/2023
Type: Other		# 2		
Comment:		Loadlines at the two tanks stored on the Location have not been bullplugged or capped.		
Corrective Action:		Comply with Rule 603.i		
		Date: 10/18/2023		
Type:		# 15		
Comment:		15 risers associated with production equipment (tanks/tank battery, separator equipment, etc...) that has been removed from the Location were observed on the southern and western areas of the working pad surface; Flowlines/risers have not been properly capped/OOSLAT during abandonment.		
		Equipment/Risers is abandoned and requires removal.		
Corrective Action:		Abide by all 1100 series rules for flowline removal from service and abandonment; remove flowline risers per 1100 and 1000 series rules.		
		Date: 10/18/2023		
Type: Other		# 1		
Comment:		Cellar at the well has not been properly covered. Cellar has also filled with fluids.		
Corrective Action:		Remove/properly dispose fluids within cellar. Properly cover or implement other measures to prevent accidental access by people, livestock, or wildlife.		
		Date: 10/18/2023		

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal				
Comment: Tank battery facility and equipment has been removed from the Location. Operator was observed on site removing remaining liner material.				
Corrective Action:				Date:

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

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Inspected FacilitiesFacility ID: 436484 Type: WELL API Number: 081-07799 Status: SI Insp. Status: RI**Idle Well**Purpose: ☒ Shut In ☐ Temporarily Abandoned

Reminder: _____

Comment: Last MIT on record 8/12/2022 (doc. 403142711) to maintain SI/TA Status.

Records show well status "Shut In" since March 2021. Per ECMC Rules, this is an "Inactive Well".

Records shows last test date for bradenhead testing is 6/15/2021; Bradenhead testing/reporting past due.

Corrective Action: **Comply with Rules 419 and 420 regarding annual testing and reporting requirements.**Date: 10/18/2023**Comply with Rule 434.c inactive well requirements; submit the required Forms and Financial Assurance**Facility ID: 436485 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Drill Cuttings		Inadequate		
Comment	<p>Remediation Project #9706 related to the management of drill cuttings on the Location was closed via Form 27 #401410420 on 10/4/2017. Operator comments within document #1313034 state that "The cuttings were buried in the cut slope, covered with three feet of clean soil, and seeded."</p> <p>It was observed in this inspection that drill cuttings remain stored along the cut slope on the south end of the working pad surface; drill cuttings appears to have never been buried and seeded as indicated within Operator's correspondence.</p>			
Corrective Action	Operator shall submit a Form 19 based on Rule 912.b.(1).E.			Date: 10/18/2023

Spill/Remediation:

Comment:		
Corrective Action:		Date: _____

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: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment [Topsoil stockpile observed on the north end of the Location.](#)

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? FailComment [Anchors observed on location missing required marking.](#)Corrective Action [Comply with Rule 1003.a and 603.j](#)Date **10/14/2023**

1003b. Area no longer in use? FailProduction areas stabilized ? Fail1003c. Compacted areas have been cross ripped? Fail

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? Fail

Production areas have been stabilized? _____

Segregated soils have been replaced? Fail**RESTORATION AND REVEGETATION**Cropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-CroplandTop soil replaced FailRecontoured Fail80% Revegetation Fail

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? F

Comment

With exception to the well, all other production equipment associated with the well has been removed from the Location; areas on the northeast/east, south and west ends of the Location are no longer necessary for production, and subject to 1003 reclamation requirements.

Corrective Action

Comply with Rule 1003.b and conduct interim reclamation on areas no longer in use including, but not limited to, compaction alleviation (cross-ripping to a minimum depth of 18 inches), recontouring/grading and revegetation activities. Comply with Rules 1002.f and 1002.c and implement control measures to protect and stabilize the seeded soils. Continue to monitor and manage interim areas to ensure site progresses towards 1003.e.(2) standards.

Date 10/18/2023Overall Interim Reclamation Fail**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

Reminder: _____

Comment: _____

Well plugged _____

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 _____

Locations, facilities, roads, recontoured _____

Compaction alleviation _____

Dust and erosion control _____

Non cropland: Revegetated 80% _____

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:						
Corrective Action:						Date
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:	See "COGCC Comments" at the end of this report.					
Corrective Action:	Comply with Rule 1002.f- Install or repair required stormwater and erosion control measures to minimize erosion, degradation and sediment transport. Ensure BMPs are implemented in accordance with good engineering practices, and maintained in proper functioning condition.					Date: 10/18/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments		
Comment	User	Date
<p>STORMWATER COMMENT</p> <p>It was observed in this inspection that stormwater and erosion control BMPs are missing or insufficient on the Location:</p> <ul style="list-style-type: none"> -Slopes on the east and north end of the Location were observed to be bare; BMPs to stabilize the slopes, as well as to minimize erosion and degradation have not been implemented per good engineering practices. -Control measures to allow for sediment laden-free stormwater discharge have not been implemented in conjunction with the outlet on the east end of the location; sediment laden stormwater was observed discharging from the working pad surface. Outlet does not appear to have been lined with geotextile material in conjunction with the rip-rap armoring- stormwater degradation to the walls of the outlet observed. -Stormwater diversion ditch along the eastern perimeter of the Location has been designed in such a manner that will discharge stormwater into an irrigation ditch- potentially impacting Waters of the State. 	trujilloam	10/19/2023

Attached Documents

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

Document Num	Description	URL
696205339	Sediment laden stormwater discharge from pad	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6291874
696205341	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6291875