

FORM
INSPRev
X/20State of Colorado
Oil and Gas Conservation Commission1120 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 FORM

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

Location

Overall Good:

Signs/Marker:

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
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location entrance		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 303-861-9480

Corrective Action:

Date: _____

Good Housekeeping:

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
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

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	# 2		corrective date
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
Type: Other	#	
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

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	
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Comment:	
Corrective Action:	Date:

Inspected Facilities

Facility 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.**
Comply with Rule 434.c inactive well requirements; submit the required Forms and Financial Assurance Date: 10/18/2023

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	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." 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.		
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 _____

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? Fail

Comment [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? Fail Production areas stabilized ? Fail
 1003c. 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-Cropland

Top soil replaced Fail Recontoured Fail 80% 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 10/18/2023

Overall 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: <input style="width: 95%;" type="text"/>	
Corrective Action: <input style="width: 95%;" type="text"/>	Date: <input style="width: 30%;" type="text"/>
Overall Final Reclamation <input type="checkbox"/>	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
403566811	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6291878
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