

State of Colorado  
Energy & Carbon Management Commission



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Document Number:  
403620385

Date Received:  
12/11/2023

**FIR RESOLUTION FORM**

Overall Status: CAC

CA Summary:

4 of 13 CAs from the FIR responded to on this Form

4 CA Completed  
0 Factual Review Request

**OPERATOR INFORMATION**

OGCC Operator Number: 10421  
Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP  
Address: 1110 SOUTH VINE STREET  
City: DENVER State: CO Zip: 80210

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Duncan Shepherd</u>	<u>(303) 861-9480</u>	<u>petromgt@comcast.net</u>

**COGCC INSPECTION SUMMARY:**

FIR Document Number: 696205338  
Inspection Date: 10/18/2023 FIR Submit Date: 10/19/2023 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: PETROLEUM RESOURCE MANAGEMENT CORP Company Number: 10421  
Address: 1110 SOUTH VINE STREET  
City: DENVER State: CO Zip: 80210

LOCATION - Location ID: 436485

Location Name: WPU-36 Number: 1 County: \_\_\_\_\_  
Qtrqr: Lot 19 Sec: 36 Twp: 11N Range: 89W Meridian: 6  
Latitude: 40.860331 Longitude: -107.325012

FACILITY - API Number: 05-081- -00 Facility ID: 436485

Facility Name: WPU-36 Number: 1  
Qtrqr: Lot 19 Sec: 36 Twp: 11N Range: 89W Meridian: 6  
Latitude: 40.860331 Longitude: -107.325012

**CORRECTIVE ACTIONS:**

9  CA# 185546

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

Response: CA COMPLETED Date of Completion: 12/02/2023

Operator Comment: Please see Form 17 No. 403608924 for missing 2022 annual Bradenhead Test that was conducted on 11/24/2022. Please see Form 17 No. 403616982 for the 2023 annual Bradenhead Test that was conducted on 12/02/2023 to bring the location into compliance with Rules 419 and 420. Lastly, regarding Rule 434.c., please see Form 5C No. 403601227.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approval of CA resolution is pending approval of the Form 5C Inactive Exception Request.

11  CA# 185548

Corrective Action: Comply with Rule 1003.a and 603.j

Date: 10/14/2023

Response: CA COMPLETED

Date of Completion: 11/03/2023

Operator Comment: Anchors have been marked per Rule 603.j. All guy line anchors left buried for future use are identified by a marker of bright color 4' in height and not greater than 1' east of the guy line anchor. See attached photo.

COGCC Decision: Approved

COGCC Representative: Approved based on photo documentation attached.

12  CA# 185549

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

Response: CA COMPLETED

Date of Completion: 12/11/2023

Operator Comment: PRM will submit an interim reclamation variance application for this location in its forthcoming OGDG application as the operator intends to drill additional wells from the existing pad. By 11/03/2023, additional seed was laid around the location perimeter slopes, and coconut mats were laid over the seeded slopes. Please see attached photos.

COGCC Decision: **Not Approved**

COGCC Representative: Inspector acknowledges PRM's intent to pursue a variance. However, unable to approve resolution as the response of "Corrective Action Complete" indicates that the corrective actions from the inspection report have been addressed. Based on the operator's comments within this resolution this does not appear to be the case.  
Please note that until a variance request has been submitted and approved, corrective action(s) and date(s) remain applicable. ECMC can not assume operator will submit a variance request. Until an official request has been submitted, inspector will continue with business as usual including follow-up inspections. Also, be aware that a submission for a variance request does not guarantee approval; corrective action(s) and action date(s) would remain applicable until resolved if request is denied.

13  CA# 185550

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

Response: CA COMPLETED

Date of Completion: 11/03/2023

Operator Comment: Stormwater erosion control measures were installed or improved to minimize erosion, degradation, and off-site sediment transport. BMPs were installed on the north and east slopes of the pad, and control measures were implemented in the stormwater diversion ditch along the eastern perimeter. Most recent stormwater inspections were performed on 10/24/2023, 11/03/2023, and 11/29/2023. Location where stormwater discharged entered the irrigation ditch was found with no discharge during stormwater inspections after ECMC inspection date. Please see attached photos. If stormwater discharge to the irrigation ditch is observed during any future stormwater inspections, additional BMPs will be installed.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules.

**OPERATOR COMMENT AND SUBMITTAL**

Comment: Email with status updates of all other corrective actions will be sent to the contact list noted on the Operator Information tab will be sent by 12/15/2023. Anticipated closure of open corrective actions is following snow melt approximately Q2 2024.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Patrick Lawler

Signed: \_\_\_\_\_

Title: Environmental Manager

Date: 12/11/2023 2:51:40 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b><u>Document Number</u></b>	<b><u>Description</u></b>
403620385	FIR RESOLUTION SUBMITTED
403621188	Photos

Total Attach: 2 Files