

State of Colorado
Energy & Carbon Management Commission



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Document Number:
403834814

Date Received:
08/14/2024

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

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

11 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

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

ECMC 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:

2 CA# 185539

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

Response: CA COMPLETED

Date of Completion: 06/25/2024

Operator Comment: A Form 27 (Document 403812687) was submitted on 06/25/2024 for the decommissioning of the tank battery facilities and production equipment. Site Assessment is currently being conducted under Rem Project #36128.

ECMC Decision: Approved pending re-inspection

ECMC Representative: CA has been resolved.

3 CA# 185540

Corrective Action: Comply with Rule 606 Rules Date: 10/18/2023

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: Various unused equipment (piping and tanks) were removed from the pad (see Photo Log under 'Attachments').

ECMC Decision: Approved

ECMC 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.

4 CA# 185541

Corrective Action: Comply with Rule 603.i Date: 10/18/2023

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: The two tanks referenced in this inspection item have been removed from the Site.

ECMC Decision: Approved pending re-inspection

ECMC Representative: Approved vis FIR 696205944

5 CA# 185542

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

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: Weed spraying was conducted the week of July 01 2024 for all areas not subject to seeding in Fall 2023. Weed monitoring/management will continue and a second round of weed spraying will be conducted in Fall 2024 for all areas of Location to maintain undesirable plant species.

ECMC Decision: Approved pending re-inspection

ECMC 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.

6 CA# 185543

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

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: Fifteen flowline risers were capped in Fall 2023 (see photos 1-8 on the Photo Log under "Attachments").

ECMC Decision: Approved

Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an

ECMC Representative: acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules.

7 CA# 185544

Corrective Action: Comply with Rule 605.h Date: 10/18/2023

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: Tanks were closed and removed from Location in Fall 2023. A Form 27 (Document 403812687) was submitted on 06/25/2024 for the decommissioning of the tank battery facilities and production equipment. Site Assessment is currently being conducted under Rem Project #36128.

ECMC Decision: Approved

ECMC Representative: Approved vis FIR 696205944

8 CA# 185545

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

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: Fluids were removed from cellar and annular space backfilled with clean fill to grade.

ECMC Decision: Approved

ECMC Representative: Approved vis FIR 696205944

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: 06/25/2024

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.

ECMC Decision: Approved

ECMC Representative:

10 CA# 185547

Corrective Action: Operator shall submit a Form 19 based on Rule 912.b.(1).E. Date: 10/18/2023

Response: CA COMPLETED Date of Completion: 06/25/2024

Operator Comment: A Form 19 Initial was approved on March 18, 2024 (Document 403661778) addressing the status of drill cuttings located on the south portion of the pad. Site Assessment is currently being performed under Form 27 (Document #403705421) for ongoing characterization of drill cuttings stockpile.

ECMC Decision: **Not Approved**

ECMC Representative: CA has been resolved.

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/regrading 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: 11/23/2023

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. Reclamation will continue throughout the 2024 growing season, as weed management is performed and areas with limited vegetation will continue to be seeded/addressed.

ECMC Decision: **Not Approved**

ECMC Representative: 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 Interim Reclamation has not been performed in accordance with 1003 Rules. Until a variance request has been submitted and approved, the corrective action and date will remain applicable and the Location will remain out of compliance with ECMC Rules and requirements.

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: 06/25/2024

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 through August 2024. Location where stormwater discharged entered the irrigation ditch was found with no discharge during stormwater inspections after ECMC inspection date. If stormwater discharge to the irrigation ditch is observed during any future stormwater inspections, additional BMPs will be installed.

ECMC Decision: Approved pending re-inspection

ECMC 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:

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: Agent for PRM Date: 8/14/2024 12:16:44 PM

ATTACHMENT LIST

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

<u>Document Number</u>	<u>Description</u>
403834814	FIR RESOLUTION SUBMITTED
403887645	Photo Log

Total Attach: 2 Files