

State of Colorado
Energy & Carbon Management Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number:

403908355

Date Received:

09/07/2024

FIR RESOLUTION FORM

Overall Status:

CA Summary:

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

8 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

Fischer, Alex

alex.fischer@state.co.us

Arthur, Denise

denise.arthur@state.co.us

Trujillo, Aaron

aaron.trujillo@state.co.us

Neidel, Kris

kris.neidel@state.co.us

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: _____

Qtrqtr: 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

Qtrqtr: Lot 19 Sec: 36 Twp: 11N Range: 89W Meridian: 6

Latitude: 40.860331 Longitude: -107.325012

CORRECTIVE ACTIONS:

1 CA# 185538

Corrective Action: Clean/remediate stained soils and spills to Table 915-1 cleanup concentrations.

Date: 10/18/2023

Response: CA COMPLETED

Date of Completion: 09/03/2024

The potential impacts of contaminated soils will be assessed using representative background data from the

Operator Comment: specified location. Background soil samples are currently undergoing analysis as per Table 915-1 standards for evaluation. A supplemental Form 27, including the evaluation results, will be submitted accordingly.

ECMC Decision: _____

ECMC Representative: _____

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. Supplemental Form 27 will be submitted week of September 9 with Table 915-1 analytical results.

ECMC Decision: _____

ECMC Representative: _____

4 CA# 185541

Corrective Action: Comply with Rule 603.i

Date: 10/18/2023

Response: CA COMPLETED

Date of Completion: 08/02/2024

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. All remaining/abandoned lines observed have been capped per Rule 603.i. One line was observed open on 8/2/24 and was capped. One anchor bolt was identified and marked. See photos. In addition, all abandoned risers and on-location flowlines, will be removed upon commencement of construction to connect the new off-location flowline to the WPU-36-1V-H2 well following the pending Welba Peak 2 OGD P approval (see Form 2A No. 403602789).

ECMC Decision: _____

ECMC Representative: _____

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: 09/03/2024

Operator Comment: Weed spraying occurred during the week of July 1, 2024, in all areas not designated for seeding in Fall 2024. Ongoing weed monitoring and management will persist, with a subsequent round of spraying planned for Fall 2024 across all areas of the location to control unwanted plant species. Additionally, a second contractor specializing in weed management will join the project for continued weed management at Welba Peak.

ECMC Decision: _____

ECMC Representative: _____

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: 09/03/2024

Form 27 (Document 403812687) was filed on June 25, 2024, for the decommissioning of tank battery facilities

Operator Comment: and production equipment. A Site Assessment was carried out under Rem Project #36128. The cellar was cleared using hydrovac, and any remaining fluids were disposed of appropriately. The cellar has been sealed and backfilled, eliminating access for people, livestock, or wildlife.

ECMC Decision: _____

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: 08/29/2024

Operator Comment: On March 18, 2024, a Form 19 Initial (Document 403661778) was approved, addressing the status of drill cuttings on the southern part of the pad. A Site Assessment is underway, as per Form 27 (Document #403705421), for the ongoing characterization of the drill cuttings stockpile, pending approval for blending into the slope or removal from the site. Analytics for the initial characterization were submitted through a Form 27s on August 29, 2024, for ECMC review.

ECMC Decision: _____

ECMC Representative: _____

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: 09/03/2024

Operator Comment: PRM has filed an interim reclamation variance application for this site (Hearing Docket No. 240800186). Additional seeding was applied around the perimeter slopes of the location, and coconut mats were placed over these seeded areas on November 3, 2023. The reclamation process has been ongoing throughout the 2024 growing season including hand seeding and hydroseeding on all slopes on location. This included weed management on July 1, 2024, the installation and repair of BMPs on slopes (such as erosion control logs and silt fences), maintenance and clearing of diversion ditches with the addition of check dams above and below the location, cleaning of the sediment fallout basin, and hydroseeding of all slopes, including the topsoil stockpile.

ECMC Decision: _____

ECMC Representative: _____

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: 09/03/2024

Operator Comment: Stormwater erosion control measures have been installed or enhanced to reduce erosion, degradation, and the transport of sediment off-site. Best Management Practices (BMPs) were applied to all slopes of the pad, with control measures implemented in the stormwater diversion ditch around the entire perimeter. Furthermore, stormwater erosion control measures were placed on the south cut slope to manage the remaining drill cuttings. All location slopes and the topsoil stockpile were hydroseeded in August 2024 to supplement the 2023 hand-seeding and coconut blanketing which yielded insufficient vegetation growth. Stormwater outlets and diversion ditches at and below the site were cleared, filter fabric was added to the outlets, and the banks were hydroseeded. The stormwater sediment fallout basin has been emptied. The most recent stormwater inspections were conducted up to September 2024. The location where stormwater discharged into the irrigation ditch showed no discharge during inspections following the ECMC 10/18/23 inspection date. Should stormwater discharge into the irrigation ditch be observed in any future inspections, additional BMPs will be implemented.

ECMC Decision: _____

ECMC
Representative: _____

OPERATOR COMMENT AND SUBMITTAL

Comment: Twelve out of thirteen corrective actions have been addressed according to the submission of this FIRR. The remaining corrective action concerning soil staining will be addressed through a supplemental Form 27, pending the receipt of subsequent soil analyses for comparative analysis. PRM is committed to the ongoing monitoring and maintenance of stormwater BMPs, with an emphasis on the removal and elimination of undesirable plant species from the location.

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

Print Name: Chris Cooper

Signed: _____

Title: Agent

Date: 9/7/2024 11:29:08 AM

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>
403909114	All remaining risers capped
403909115	Last identified pipe closed for wildlife
403909117	Remaining anchor bolt marked
403909145	North slope hydroseed, erosion control logs, clean ditch and check dams
403909157	Northwest access road slope hydroseed, erosion control logs, clean ditch and check dams
403909160	East slope hydroseed
403909163	Slope pad berm hydroseed
403909164	Northwest slope hydroseed, erosion control logs, topsoil stockpile hydroseed
403909167	South slope hydroseed
403909170	South slope hydroseed, silt fence drill cuttings, ditch and check dams cleaned
403909171	Stormwater outlet banks hydroseed
403909173	Stormwater outlet banks hydroseed
403909174	Filter fabric added to stormwater outlet
403909178	Sediment control basin cleaned out
403909180	Drill cuttings slope silt fence installed

Total Attach: 15 Files