

**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:

10/17/2024

Submitted Date:

11/22/2024

Document Number:

712300102**FIELD INSPECTION FORM**Loc ID 436485 Inspector Name: Maxwell, Logan On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10421Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORPAddress: 1110 SOUTH VINE STREETCity: DENVER State: CO Zip: 80210**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
- 
- ☒
- FOLLOW UP INSPECTION REQUIRED
- 
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

**Findings:**8 Number of Comments1 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
		aaron.trujillo@state.co.us	
		alex.fischer@state.co.us	
		emily.waldron@state.co.us	
		kris.neidel@state.co.us	
		chris@fieldinghillllc.com	
		hhill@fieldinghillllc.com	

**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 10/17/2024, Reclamation Specialist Maxwell and Reclamation Work Lead Trujillo conducted a reclamation inspection at PRM's WPU-36-1 #H2, Location #436485 in Moffat County, Colorado.

PRM representative Chris Cooper was on site at the time of inspection.

This inspection is a follow-up to #696206212 and #696205338 to document compliance with the following corrective actions:

- Weed Management
- Removal of unused riser equipment
- Management of E&P Waste
- Stormwater

This inspection is also in response to Resolution Nos. 403908355 and 403983539 stating corrective actions have been completed.

The following compliance issues were observed during this inspection:

- Weed Management

Refer to the "Location," and "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.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	<p>Previous inspections observed Undesirable Plant Species (Bull thistle, Canada thistle, Houndstongue) established on the Location, including the cut and fill slopes. Inspections required Operator to comply with Rule 606.c and 1003.f by 10/18/2023.</p> <p>It was observed in this inspection that Noxious Weeds have persisted on the Location; work to address the compliance issues have not been performed, or has been insufficient throughout the entire Location.</p> <p>See COMMENT #1 at the end of this report.</p>		
Corrective Action:	<p>CA per inspection #696205338: Comply with Rules 606.c and 1003.f.</p> <p>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.</p>		Date:

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type:	#		corrective date
Comment:	<p>Inspection #696206212 observed that unused riser equipment had not been removed from the Location.</p> <p>It was observed in this inspection that flowline risers were removed per the 1100 and 1000 series rules. This CA has been resolved.</p>		
Corrective Action:			Date:

**Venting:**

Yes/No			
Comment:			
Corrective Action:			Date:

**Flaring:**

Type			
Comment:			
Corrective Action:			Date:

Inspected Facilities									
Facility ID:	436484	Type:	WELL	API Number:	081-07799	Status:	SI	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	436485	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental					
<b>Waste Management:</b>					
Type	Management	Condition	GPS (Lat) (Long)		
Drill Cuttings					
Comment	At the time of inspection, Operator was in process of removing and disposing of the cuttings pile off-site. It was observed that the cuttings pile was out of compliance with E&P waste protection, including missing or inadequate secondary containment measures. During Inspection #696206212, Operator indicated using Silt Fence as containment measure for E&P Waste, and it was observed during this inspection that it was not properly installed/maintained as a BMP to contain waste. It was also noted that silt fence is not an appropriate control for secondary containment.  Operator notified staff on 10/18/2024 that adequate containment measures were implemented around the cuttings pile and that the silt fence was removed. This CA has been resolved.				
Corrective Action					Date:
<b>Spill/Remediation:</b>					
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 \_\_\_\_\_

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? Pass

Comment

Inspection #696205338 observed anchors on Location missing required marking. It was observed in this inspection that three (3) anchors had been removed and the final anchor had been marked. The marker (T-post) had fallen over, but was corrected at the time of inspection. Maintain markers per Rule 603.j.

This CA has been resolved.

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_

Cuttings management: Cuttings in process of being removed

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

## 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

It is noted that Operator submitted docket #240800186 requesting a 502 variance to Rule 1003.b for delayed Operations; the variance request is currently pending Hearings and a decision by the Commission. Initial reviews by ECMC Staff note that this is an incomplete variance request pursuant to the January 5, 2017 "Interim Reclamation Procedures for Delayed Operations" NTO. Be advised- 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. Additionally, approval of a variance does not absolve the operator from possible enforcement action due to past non-compliance of the reclamation rules.

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**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 ☐ Multi-Well Location ☐

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Ditches	Pass					
Hydro Mulch	Pass					

Comment:

Inspection #696206212 observed that stormwater and erosion control BMPs were missing or insufficient on the Location.  
  
In this inspection, it was observed that slopes on the north and east end of the Location were stabilized via hydro-mulch. At the the north and east ends of the Location, control measures to allow for sediment laden-free stormwater discharge were implemented at the stormwater outlets, which were previously observed degrading. Geotextile material in conjunction with rip-rap armoring were installed per good engineering practices. These CAs have been resolved.

Corrective Action:

Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments		
Comment	User	Date
COMMENT #1: Weeds Due to winter dormancy issues, weeds cannot be adequately addressed for the remainder of the 2024 calendar year. Additional management efforts will need to be taken during the 2025 growing season, as soon as environmental conditions allow. This Location will remain out of compliance and the original corrective action and date will remain applicable.	maxwelll	11/22/2024

Attached Documents

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

Document Num	Description	URL
404004750	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6797726">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6797726</a>
712300107	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6797719">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6797719</a>