

**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:

12/31/2024

Submitted Date:

01/03/2025

Document Number:

718100140

**FIELD INSPECTION FORM**

Loc ID 316731 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

ECMC Operator Number: 56680  
Name of Operator: MERRION OIL & GAS CORP  
Address: 610 REILLY AVENUE  
City: FARMINGTON State: NM Zip: 87401

**Findings:**

- 6 Number of Comments
- 2 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
		j75rober@blm.gov	
		pthompson@merrion.bz	
Heil, John		john.heil@state.co.us	
		lindsey.organ@aecdenvr.com	
		taylor.elm@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
232418	WELL	PA	08/18/2023	GW	103-66126	LLOYD-FEDERAL 22-X-17	RI
316731	LOCATION	CL			-	LLOYD-FEDERAL-62N97W 17SENW	RI

**General Comment:**

On 12/31/2024, Western Reclamation Work Lead Trujillo conducted a final reclamation inspection at Lloyd-Federal 22-X-17 location in Rio Blanco County, Colorado.

Location is Fed Surface, Fed Mineral.

Location is within the following High Priority Habitats: Mule Deer Severe Winter Range; Mule Deer Winter Concentration Area.

Scout card records show Merrion Oil and Gas Corp as the Operator responsible for the Location and Well. However, Form 9s #403574666 on file shows Anschutz Exploration acquired the Location effective 9/29/2023. There appears to be some outstanding COAs and/or issues resulting in the Location not being transferred to Anschutz Exploration; therefore this inspection is being submitted to both Operators.

This inspection is a follow-up to #696206333 to document compliance with the following corrective actions:

- Good Housekeeping
- Final Reclamation
- Facility Closure requirements
- Spills
- Tanks Open / Missing covers to prevent access by wildlife.

It was observed in this inspection that the Location remains out of compliance with ECMC Rules and corrective actions.

Refer to the Location, Environmental and Reclamation sections of this report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspection that have not been addressed are still applicable.

#### ADDITIONAL COMMENTS

Pursuant to Form 2A #403549787 for the Mohee Fed 0297-17 Location. "The Lloyd Federal 22-X-17 (Merrion Operated) location is in the 1202.d density range, however it is scheduled for reclamation by May 2024. In the event the Llyod Federal #22-X-17 location is not reclaimed by May of 2024, AEC will remit \$45,592.05 to CPW for potential indirect mitigation fee. If that is required AEC will sundry the 2A to update the Wildlife Mitigation Plan and Form 2A". As documented within inspection #696206333 (dated 09/26/2024) and this inspection, the Llyod Federal #22-X-17 location (API 05-103-66126) has not been reclaimed

Including Area CPW Energy Liaison for notification purposes.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	TRASH		
Comment:	<p>Inspection #696206333 observed various trash/debris (including non-E&amp;P waste such as cement/concrete blocks/etc...) observed improperly stored on the Location. Inspection required Operator to comply with 606 Rules, and Rule 906.c by 10/4/2024</p> <p>It was observed in this inspection that debris (cement/concrete blocks/etc...) have not been removed from the Location.</p> <p>This CA has not been addressed and remains applicable.</p>		
Corrective Action:	<p>Corrective Action per Inspection #696206333:</p> <p>Comply with Rule 606 Rules. Operators will properly dispose of all trash, rubbish, and other waste materials as nonhazardous/non-E&amp;P solid waste, pursuant to Rule 906.c. No trash, waste, rubbish, or other materials will be burned or buried at an Oil and Gas Location.</p>	Date:	

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Inspection #696206333 observed an open container storing unknown fluids/chemicals stored on the Location; fluids have been spilling out of the container resulting in impacts to soils/pad surface. Inspection required Operator to remove and properly dispose of fluids within the container, to remove the container if not longer necessary, and to clean/remediate spills by 10/14/2024.

Limited inspection due to snow cover- container with fluids have been removed from the location, however, inspector was unable to determine if spills were adequately cleaned/remediated. A follow-up inspection will need to be conducted in order to confirm compliance with Rules and Corrective Actions.

Multiple Spills and Releases?

**Equipment:**

Type:	#		corrective date
Comment:	<p>Inspection #696206333 observed tanks on the location with open manholes and hatches. Inspection required Operator to comply with Rule 609.c and 902.b by 10/4/2024.</p> <p>It was observed in this inspection that the tanks have been removed from the Location. This CA is no longer applicable.</p>		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		

Corrective Action:

Date:

**Inspected Facilities**

Facility ID: 232418 Type: WELL API Number: 103-66126 Status: PA Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 316731 Type: LOCATION API Number: - Status: CL Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**Environmental**

**Spill/Remediation:**

Comment:

Inspection #696206333 observed that facilities on the Location have not been closed pursuant to Rule 911. Inspection required Operator to comply with Rule 911 and contact area EPS by 10/2/2024.

Operator submitted Form 27(i) #403944635 for the decommissioning of Oil and Gas Facilities on 10/3/2024. This Corrective Action has been resolved; Remediation Project #37847 is currently "in process".

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: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

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? \_\_\_\_\_

Comment \_\_\_\_\_

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: \_\_\_\_\_  
 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? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment:

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed **Fail** \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed **Fail** \_\_\_\_\_ Locations, facilities, roads, recontoured **Fail** \_\_\_\_\_

Compaction alleviation **Fail** \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% **Fail** \_\_\_\_\_ 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	<b>Fail</b>	Well Release on Active Location	<input type="checkbox"/>	Multi-Well Location	<input type="checkbox"/>
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**ECMC Comments**

Comment	User	Date
<p>Pursuant to Rule 1004.a, upon the plugging and abandonment of a well, all debris, abandoned gathering/flowline risers, and surface equipment shall be removed within 3 months of plugging a well. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. All such reclamation work shall be completed 12 months on non-crop land after plugging a well or final closure of associated production facilities.</p> <p>Records show well was P&amp;A 8/18/2023.</p> <p>Inspection #696206333 observed that Final Reclamation has not been conducted in accordance with 1004 Rules: Production equipment (Tanks/risers/separators/etc...), as well as trash/debris, remain improperly stored on the Location; pursuant to Rule 1004.a, debris/equipment was required to be removed from the Location by 11/18/2023. Location has not been decompacted, recontoured/regraded and reclaimed; pursuant to Rule 1004.a, Final Reclamation work was required to be completed by 8/18/2024. Inspection required Operator to conduct final reclamation in accordance with 1004 Rules.</p> <p>It was observed in this inspection that the Location remains out of compliance with 1004 Rules and requirements.</p> <p>-Riser equipment (north end of Location), as well as cement/concrete blocks and debris have not been removed, and Location has not been decompacted, recontoured/regraded and reclaimed.</p> <p>Corrective actions have not been resolved, this Location will remain out of compliance with 1004 Rules until addressed.</p>	trujilloam	01/03/2025

**Attached Documents**

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

Document Num	Description	URL
404047574	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862706">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862706</a>
718100141	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862702">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6862702</a>