

**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:

05/01/2025

Submitted Date:

05/22/2025

Document Number:

712300114

FIELD INSPECTION FORM

Loc ID 312756 Inspector Name: Maxwell, Logan 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: 10386
Name of Operator: POC-I LLC
Address: P.O. BOX 51208
City: CASPER State: WY Zip: 82605

Findings:

- 18 Number of Comments
- 14 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
Enforcement, ECMC		dnr_cogccenforcement@state.co.us	
		emily.gaasche@state.co.us	
		kris.neidel@state.co.us	
	307-746-6468	rpodio@gmail.com	
		aaron.trujillo@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
116587	PIT	AC			-	ILES GATHERIN FACILITIES	RI
116589	PIT	AC			-	ILES DOME SUNDANCE TANK BAT 2/PIT	RI
119213	PIT	AC			-	ILES DOME UNIT	RI
312756	LOCATION	AC			-	ILES DOME UNIT-64N92W 23SWNW	RI
480890	TANK BATTERY	AC	10/07/2021		-	Iles Dome Tank Battery	RI

General Comment:

On 05/01/2025, Reclamation Work Lead Trujillo, Reclamation Specialists' Maxwell and Gaasche, and EPS Neidel conducted a stormwater inspection at POC-I LLC's Iles Dome Unit - Pit Facility ID #'s: 116587, 119213, 116589 and Tank Battery #: 480890 in Moffat County, Colorado.

Location is within the following High Priority Habitats: 1202.c. Aquatic Cutthroat Trout Designated Crucial habitat, Aquatic Native species conservation waters, Prairie Falcon Active Nest site; 1202.d. Columbian Sharp tailed grouse production area, elk migration corridor, elk severe winter range, elk winter concentration area, Greater sage grouse priority habitat management, Mule deer migration corridor, Mule deer severe winter range, Mule deer winter concentration area; 309.e.1. Columbian sharp tailed grouse winter range, Greater sage grouse general habitat management

The following compliance issues were observed during this inspection:

- Signage
- Track-out controls
- Unused equipment
- Trash/debris
- Weeds
- Spills
- Protection of Soils
- Wildlife Protections
- Stormwater
- Secondary Containment

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

Refer to the "Location", "Environmental" and "Reclamation" section of this inspection report for additional details.

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

This inspection is in response to NOAV 403425590 (issued 6/07/2023). It was observed that this Location remains out of compliance with NOAV Corrective Action and Abatement requirements.

Any corrective action(s) from previous inspections that have not been addressed are still applicable; Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	BATTERY		
Comment:	It was observed in this inspection that the sign at the tank battery sign was missing the well names and API numbers associated with the tank battery.		
Corrective Action:	Comply with Rule 605.e.	Date:	
Type	OTHER		
Comment:	Signage posted at the access point to the facility appears to be missing the permit no. per Rule 605.f.(1).		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	It was observed in this inspection that signage/labeling on the container placed on the south end of the Battery facility is no longer legible.		
Corrective Action:	Comply with Rule 605.h.	Date:	
Emergency Contact Number:			
Comment:	Emergency Contact: 1-307-237-7854		
Corrective Action:		Date:	
Good Housekeeping:			
Type	WEEDS		
Comment:	It was observed in this inspection that Undesirable plant species, such as Canada Thistle and Russian Thistle, have established along portions of the pit perimeter.		
Corrective Action:	Comply with Rule 606.c.	Date:	<u>05/30/2025</u>
Type	TRASH		
Comment:	It was observed in this inspection that various trash, debris and/or unused equipment was observed throughout the Location; including areas along the perimeter of the pit, outside of the fence, within the pit, and surrounding the tank battery.		
Corrective Action:	Comply with Rule 606.	Date:	<u>05/30/2025</u>
Type	UNUSED EQUIPMENT		
Comment:	Unused pipe riser observed at the east end of the Tank Battery have not been properly covered to prevent wildlife access, including birds and bats. Refer to photo 41.		
Corrective Action:	Comply with Rule 606 and 902.b.	Date:	<u>06/06/2025</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Comment:	Stained/impacted soils observed throughout areas of the pit facility, on the access road, and the surrounding Tank battery.		
Corrective Action:	Remove and properly dispose of impacted material pursuant to Rule 912.a. Clean/remediate impacts to Table 915-1 cleanup concentrations.		Date:
	Tank		
Comment:	It was observed in this inspection fluids have spilled within the honey pots at the tanks. It was also observed that the loadlines have not been properly capped or plugged.		

Corrective Action:	Comply with Rule 603.i and cap/plug loadlines at tanks. Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition comply with Rule 608.e., and remove and properly dispose fluids pursuant to Rule 912.	Date:	
	Tank		
Comment:	It was observed in this inspection that fluids remain within secondary containment at the northern portion of the Tank Battery.		
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition. Remove and properly dispose fluids pursuant to Rule 912.	Date:	

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:			corrective date
Type:	Bird Protectors	#	
Comment:	It was observed in this inspection that anchor pipes, risers, and hose attachments at the pit facility, and the stacks of the tanks at the tank battery facility have not been properly covered to prevent access by wildlife, including birds and bats.		
Corrective Action:	Comply with Rule 902.b.- install covers or other BMPs to prevent wildlife access to the tank equipment.	Date:	05/30/2025
Type:		#	
Comment:	Previous inspections observed that fencing, nets, and CPW-approved exclusion devices were not installed/maintained per Rule 1202, at the Pit and Tank Battery. It was observed in this inspection that the fencing, nets, and CPW-approved exclusion devices remain missing/broken, allowing wildlife access to the pit facility. Birds were observed landing in the pits and walking through the E&P waste. See photo documentation.		
Corrective Action:	Comply with Rules 902.b. and 1202.a.(4).	Date:	
Type:		#	
Comment:	It was observed in this inspection that gaps/holes/burrows have developed along the perimeter of the cement pit at the battery facility. Additionally, the panels surrounding the cement pit are in disrepair, resulting in gaps/holes within the containment measure.		
Corrective Action:	Comply with Rule 902.b. - Install or repair BMPs at the pit openings to prevent wildlife access.	Date:	05/30/2025

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 116587 Type: PIT API Number: - Status: AC Insp. Status: RI

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

Facility ID: 116589 Type: PIT API Number: - Status: AC Insp. Status: RI

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

Facility ID: 119213 Type: PIT API Number: - Status: AC Insp. Status: RI

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

Facility ID: 312756 Type: LOCATION API Number: - Status: AC Insp. Status: RI

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

Facility ID: 480890 Type: TANK API Number: - Status: AC Insp. Status: RI

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

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: It was observed in this inspection at pit facility #119213, that produced fluids appear to be leaving the pit from an eroded berm on the northeast side, moving along the "access road" inside the gate and moving off-site of the Location (outside of the gate).

Corrective Action: Maintain secondary containment to ensure BMP remains impervious to contain a spill or release. Comply with Rule 912.a and clean/remediate stained soils to Table 915-1 cleanup concentrations.

Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment It was observed in this inspection that a soil stockpile exists on the southwest portion of the pit facility. It appears that at one point, this was topsoil (evident from the vegetation growing on the backside of the pile). It appears that Operator has been utilizing the stockpiled material as a "barrow" area. It is unclear if the soil has been contaminated. Rill erosion is evident on north side of stockpile moving towards the pit. Operator shall stabilize stockpiled soil and implement stormwater BMPs.

Corrective Action Install or repaired required BMPs to protect the stockpile from wind and water erosion in accordance with Rule 1002.c. and 1002.f.

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? _____ F _____

Comment Noxious weeds (Canada thistle) observed established along areas of the pit. See "Good Housekeeping."

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 _____ 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
Other						
Comment:	<p>It was observed in this inspection that the vehicle tracking control pad at the entrance to the pit facility has not been installed per good engineering practices. BMPs have been installed with small gravel material, rather than larger sized, coarse aggregate.</p> <p>It was observed that stormwater and degradation issues were present at the pit facility, including around the berms, soil stockpile; gully and bank erosion was observed at the northwest end of the pit near seeping gulch and the sediment trap.</p>					Date: _____
Corrective Action:	<p>Comply with Rule 1002.f- Install or repair stormwater and erosion control BMPs in accordance with good engineering practices, and ensure BMPs are maintained in a proper functioning condition.</p>					
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
712300123	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7062557