

On 07/02/2025, Reclamation Specialist Maxwell and Reclamation Work Lead Trujillo conducted a reclamation inspection at PRM's unpermitted Oil and Gas Location referred to as the "Duncan Unpermitted Facility", Location #485573, and the related nearby Beaver Creek stream crossing in Moffat County, Colorado.

This inspection is a follow-up to #696206210 to document compliance with the following corrective actions:

- Weed Management

This inspection is also in response to NOAV #403890794 issued 8/15/2024.

The following compliance issues were observed during this inspection:

- Weed Management

- Storage of Supplies or Materials

Refer to the "Location," and "Reclamation," 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 is Fee Surface, Federal Minerals. Location and associated flowline system are within the following High Priority Habitats: Elk Migration Corridor; Elk Production Area; Elk Severe Winter Range; Mule Deer Severe Winter Range; Mule Deer Winter Concentration Area; Aquatic Sportfish Management Waters; Aquatic Native Species Conservation Waters; Aquatic Cutthroat Trout Designated Crucial Habitat. Location also within other Consultation Habitats, including Columbian Sharp Tailed Grouse Winter Range (a Colorado State species of concern). Location is approximately 1.4 miles from a known Columbian Sharp Tailed Grouse NSO Lek Site buffer, and there are 3 other known lek sites also within relatively close proximity to the Location and flowline system disturbance.

This inspection does not identify all the alleged compliance issues associated with this Location (e.g. permitting requirements, etc...), rather, only the compliance issues that were apparent at time of the inspection.

Due to the nature of the issues associated with this Location, this site will be considered "Out of Compliance" with ECMC Rules and Regulations until, at a minimum, all permitting and compliance issues have been resolved. Corrective action dates are not being provided within this Report, as many issues can not be resolved until the approval of an OGDPA and 2A.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	WEEDS		
Comment:	It was observed that efforts to control weeds were conducted, however weeds (Musk Thistle, Bull Thistle, Houndstongue, Cheatgrass) were observed establishing within areas of the Operator's disturbances, including the Location, Flowline System disturbance, and access road to the stream crossing. Operator on site was provided notice of the weed issues and management requirements.		
Corrective Action:	Comply with Rules 1003.f and 606.c. Ongoing weed management required.	Date:	
Type	STORAGE OF SUPL		
Comment:	Pursuant to Condition #4 provided to PRM in ECMC email correspondence dated 10/19/2023, PRM shall ensure that "The location cannot be used for storage of any materials except for the large equipment that is currently on the location". It was observed in this inspection that Operator has stockpiled additional materials on the Location in violation of the COA.		
Corrective Action:	Comply with Rule 606 and Condition #4 per ECMC email correspondence dated 10/19/2023.	Date:	08/08/2025

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 485573 Type: LOCATION API Number: - Status: AC Insp. Status: RI

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

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 [See "1002.b-Soil Removal and Segregation" under "COGCC Comments" at the end of this report, for comment regarding topsoil.](#)

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment [See "1002.b-Soil Removal and Segregation" under "COGCC Comments" at the end of this report, for comment regarding topsoil.](#)

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 It was observed in this inspection that areas revegetated near the stream crossing were progressing towards 1003 standards. Plant species observed include: western wheatgrass, yellow sweetclover, and western yarrow. Weeds were also observed in these areas (see "Good Housekeeping" section).

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
<p>Comment: Previous inspections (#696205931) observed cracks forming along the edge of the pad and along the contour of the fill slopes, and that stabilization concerns exist that may result in mass soil migration.</p> <p>Operator had previously repaired the cracks, however, it was observed in this inspection stabilization concerns remain as cracking along the sill slopes are recurring.</p>						
<p>Corrective Action: _____</p>						<p>Date: _____</p>
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

ECMC Comments

Comment	User	Date
<p>1002.E- SURFACE DISTURBANCE MINIMIZATION</p> <p>Previous inspections observed that Operator constructed a pipeline leading to and from the Duncan Unpermitted Facility; pipeline travels south approximately 4 miles, and crosses multiple drainages and Wetland (Riverine) corridors with an ECMC designation of "Aquatic High Priority habitats", including Aquatic Sportfish Management Waters, Aquatic Native Species Conservation Waters and Aquatic Cutthroat Trout Designated Crucial Habitat. Part of the construction also included new roads with stream crossings.</p> <p>The Operator submitted stamped engineering plans for the stream crossing to satisfy requirements pursuant to NOAV #403890794.</p> <p>As stated in the Form 4, #404108249:</p> <p>Approval of the "Stream Crossing" is for access to the flowline ROW; for maintenance and emergency purposes. In the event of the OGDPA and Form 2A for this Location is denied by the Commission, the Stream Crossing and access road disturbances will require reclamation in accordance with ECMC Rule 1004 requirements; and the Flowline abandoned in accordance with Rule 1105 requirements.</p> <p>Staff will determine if the stream crossing was constructed/installed and maintained properly per good engineering practices at a future inspection.</p>	maxwell	07/30/2025

<p>1002.b-SOIL REMOVAL AND SEGREGATION</p> <p>Pursuant to Section 4.2 of the Topsoil Protection Plan, it is stated that 600 cubic yards of topsoil was not properly separated and stored. As documented within Field Inspection Reports and NOAV #403890794, Operator failed to salvage and store approximately 2,099 cubic yards of topsoil during the construction of the "Duncan Unpermitted Pad" Location.</p> <p>Therefore, at a minimum, 2,099 cubic yards of topsoil material is required to be imported and stored on the Location in order to replace the topsoil material lost during construction.</p> <p>As stated in the Form 4, #404144118: Based on the soil analytical results provided, it has been determined that the proposed topsoil replacement source is sufficiently equivalent, and is conditionally approved.</p> <p>Operator shall provide notice to ECMC Staff at least 2 business days prior to importation of replacement topsoil material via a Form 42 Notice of Construction or Major Change.</p> <p>Within 30 days of commencement of "Expansion" construction operations, Operator shall import and store 2,099 cubic yards of replacement topsoil material onto the Location.</p> <p>In the event of the OGD and Form 2A for this Location being denied by the Commission, the Operator shall import and store 2,099 cubic yards of replacement topsoil material onto the Location within 30 days of denial for final reclamation.</p> <p>The Operator submitted a Topsoil Protection Plan to satisfy requirements pursuant to NOAV #403890794, and have identified a topsoil source to import onto the Location. Staff will determine if the topsoil imported and the stockpile amounts meet expectations once soil has been imported and stored on the Location.</p>	<p>maxwell</p>	<p>07/30/2025</p>
---	----------------	-------------------

Attached Documents

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

Document Num	Description	URL
404302278	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7170294
712300188	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7170273