

This inspection was submitted by ECMC staff Anthony Dunnam on behalf of Logan Maxwell due to technical difficulties.

On 09/10/2025, Reclamation Specialist Maxwell 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 #712300171 to document compliance with the following corrective actions:

- Weed Management
- Storage of Supplies or Materials

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

The following compliance issues were observed during this inspection:

- Weed Management
- Stormwater Management

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 OGD and 2A.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	At the time of the previous inspection, unused rock material was observed stockpiled near the entrance of the Location. This pile has been removed. This CA has been resolved.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	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. 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. Weeds may be entering periods of dormancy and will need to be assessed during the next inspection, as environmental conditions allow.		
Corrective Action:	Comply with Rules 1003.f and 606.c. Ongoing weed management required.	Date:	

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

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Previous inspections (#696205931 and #712300171) 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.

It was observed in this inspection that stabilization concerns remain as cracking along the fill slopes are recurring. Stabilization concerns with risk of mass soil migration exist on the Location.

Corrective Action: Pursuant to Rule 1002.f, operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation

Date: _____

Pits: NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
At the time of inspection, it was observed that the stream crossing construction was still occurring. Staff will determine if the stream crossing was constructed/installed and maintained properly per good engineering practices at a future inspection.	dunnama	09/17/2025

Attached Documents

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

Document Num	Description	URL
404357424	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240581
718600969	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7240579