

FORM
INSPRev
X/20

State of Colorado Energy and Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

10/29/2025

Submitted Date:

11/07/2025

Document Number:

712300254

FIELD INSPECTION FORM

Loc ID 316784	Inspector Name: Maxwell, Logan	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 6 Number of Comments 2 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: ECMC Operator Number: 90450 Name of Operator: TRUE OIL LLC Address: P O BOX 2360 City: CASPER State: WY Zip: 82601				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:			
Contact Name	Phone	Email	Comment
		Erich.Schmidt@truecos.com	
		steve.freese@state.co.us	
		mfitz@co.routt.co.us	
		Pam.Frisby@truecos.com	

Inspected Facilities:							
Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
281546	WELL	PA	06/28/2020	GW	107-06225	BREEZE UNIT 34-8	RI
294936	PIT	AC			-	BREEZE STATE 15-8	RI
316784	LOCATION	CL			-	BREEZE UNIT-66N89W 8SWSE	RI

General Comment:

On 10/29/2025, Northwest Reclamation Specialist Maxwell and Routt County Planner Fitz, conducted a final reclamation inspection at True Oil's Breeze Unit 34-8 Location and pit in Routt County, Colorado. The well was PA'd 7/28/2020 and shares the Location with a former well, (API #05-107-06220, PA'd 08/3/2004) and Pit (ID: 294936).

The Location is on State Land Board Surface and is in black bear habitat. In addition, the Location is in the following HPH: Rule 1202.c. NSO for Columbian Sharp Tailed Grouse Lek site; Rule 1202.d. density for: Columbian Sharp Tailed Grouse production area, Elk severe winter range, Elk Winter Concentration area, and Mule Deer Migration Corridor; Rule 309.e.1. for Columbian Sharp Tailed Grouse Winter Range, and Greater Sage grouse general habitat management.

The following compliance issues were observed in this inspection:
 -Weed Management
 -Final Reclamation
 -Flowline abandonment

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 actions from previous inspections that have not been addressed remain applicable. Any new corrective actions without corrective action dates, requires that the Operator comply with the Rules as soon as possible or when environmental conditions permit. 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:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:

Type	#	corrective date
Flow Line		
Comment:	It is not clear that flowlines have been properly abandoned in the COGIS database. Per a COA listed in Doc # 402150795: Properly abandon flowlines as per Rule 1105. File electronic Form 42 once on location abandonment complete. Within 30 days of an operator completing abandonment requirements for an off-location flowline or crude oil transfer line the operator shall submit a Flowline Report, Form 44.	
Corrective Action:	Rule 1105.f.- Properly abandon flowlines or submit documentation.	Date: 12/05/2025

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities

Facility ID: 281546 Type: WELL API Number: 107-06225 Status: PA Insp. Status: RI

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

Facility ID: 294936 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: 316784 Type: LOCATION API Number: - Status: CL Insp. Status: RI

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

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
Comment				
Corrective Action				Date:

Spill/Remediation:

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: _____

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 [It appears the Pit 15-8 \(ID:294936\) was closed, but is still listed as Active in the database.](#)

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 Pass Pit mouse/rat holes, cellars backfilled Pass

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

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

Compaction alleviation **Fail** Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

Comment:

Vegetation observed on the access road and Location was Indian Ricegrass, Intermediate wheatgrass, cheatgrass, Leafy Spurge, Dalmatian Toadflax, Canada Thistle, Musk thistle, Hounds tongue, Field pennycress, Russian Thistle and Scotch thistle.

Reference area vegetation was Big sagebrush, Western wheatgrass, Curly cup gumweed, and Spiny phlox.

See additional "Comments" at the end of the Inspection Report.

Corrective Action: **Comply with 1004 Rules.** Date _____

Overall Final Reclamation **Fail** 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

Comment: **At the time of this inspection, no stormwater issues were observed.**

Corrective Action: _____ Date: _____

Pits: NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>This location does not meet reclamation regulations; insufficient vegetative cover. In addition, it appears that compaction alleviation was not sufficient, and primarily undesirable plant species were observed across the Location and access road. Gravel and debris (T-posts) were also observed on the access road and on the Location. If the fence was not previously at the Location, remove upon final reclamation closure.</p> <p>CA: Conduct additional reclamation in accordance with ECMC 1000 series rules. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed.</p> <p>Conduct weed management to prevent further establishment and spread of Noxious Weeds; ongoing weed management required until location passes final reclamation.</p>	maxwelll	11/07/2025

Attached Documents

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

Document Num	Description	URL
404428500	INSPECTION SUBMITTED	https://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7323027
712300256	Inspection Photos	https://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7323025