

**FORM
INSP**

Rev
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:

04/09/2026

Submitted Date:

04/21/2026

Document Number:

712300281

FIELD INSPECTION FORM

Loc ID 485573 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: 10421
Name of Operator: PETROLEUM RESOURCE MANAGEMENT CORP
Address: 1110 SOUTH VINE STREET
City: DENVER State: CO Zip: 80210

Findings:

- 15 Number of Comments
- 8 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
		chris@fieldinghillllc.com	
		aaron.trujillo@state.co.us	
		hhill@fieldinghillllc.com	
		jmckinley@fieldinghillllc.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
485573	LOCATION	AC			-	DUNCAN FACILITY	RI

General Comment:

On 04/09/2026, Acting Reclamation Supervisor Trujillo and Northwest Reclamation Specialist Maxwell conducted a reclamation inspection at PRM's Duncan Facility Oil and Gas Location, Location #485573, and the related nearby Beaver Creek Stream Crossing in Moffat County, Colorado.

This inspection is a follow-up to 718600968 to document compliance with the following corrective actions:

- Weed Management
- Stormwater Management

This inspection is also in response to NOAV #403890794, issued 8/15/2024 and NOAV #404505690, issued 1/14/2026.

Staff met with the Operator representatives on-site and were able to discuss many of the issues observed on the Location. The Operator relayed to Staff that many of the issues were in process of being resolved. Staff received some documentation that some of the issues have been resolved prior to this inspection being submitted.

The following compliance issues were observed during this inspection:

- Good Housekeeping
- Fluids in containment
- Wildlife Protections
- Stormwater Management
- Topsoil Salvage

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.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	It was observed in this inspection that three of the tanks were missing tank labels; some labels were peeling off or fading.		
Corrective Action:	Comply with Rule 605.h.		Date: <u>05/08/2026</u>
Type	BATTERY		
Comment:	It was observed in this inspection that the facility tank battery signage was missing.		
Corrective Action:	Comply with Rule. 605.e.		Date: <u>05/08/2026</u>
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	It was observed in this inspection that trash (i.e., pipe insulation, pallets, etc.) , debris, and unused equipment was apparent around the Location. Some of this was removed while Staff was on-site.		
Corrective Action:	Comply with Rule 606.		Date: <u>05/08/2026</u>
Type	WEEDS		
Comment:	It was observed in the previous inspection that weeds had been treated, but were prevalent throughout the Location. FIRR #404445498 was submitted stating that additional weed treatments had been conducted in September 2025 and will be conducted in spring 2026. Vegetation growth, including weeds, will have to be assessed during the next inspection, when the growing season is more active. The CA remains applicable until a future inspection is conducted.		
Corrective Action:	Comply with Rules 606.c and 1003.f. Keep Location free of all Undesirable Plant Species. Ongoing weed monitoring/management required.		Date:
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Comment:	Stained soils were observed near the tank battery.		
Corrective Action:	Comply with Rule 912.a; clean/remediation stained soils to Table 915-1 standards.		Date: <u>05/08/2026</u>
In Containment: <u>No</u>			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
Equipment:			
Type: Bird Protectors	#		corrective date
Comment:	It was observed in this inspection that the some equipment (e.g., honey pot loadlines, temporary holding tanks, combustor stack) lacked protective covers; additionally secondary containment measures were missing BMPs, or BMPs are insufficient, to prevent access to wildlife, including birds or bats.		
Corrective Action:	Comply with Rule 902.b. and Rule 603.i.		Date: <u>05/01/2026</u>

Tanks and Berms:					
Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE					
Comment:	It was observed in this inspection that condensate remains within a temporary tank at the southeastern portion of the Location. Other fluids were observed in the larger holding container. It was also observed that fluids were apparent within the honey pots at the tank batteries.				
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: 05/08/2026
Paint					
Condition					
Other (Content)					
Other (Capacity)					
Other (Type)					
Berms					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:					
Corrective Action:					Date:
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

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment "See "COGCC Comment", "TOPSOIL SALVAGE" at the end of this report".

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment It was observed in this inspection that the topsoil at the Duncan facility had been surrounded with perimeter BMPs (wattles) and an electric line; the topsoil stockpile appeared to have been seeded with straw mulch and a tackifier. At the Beaver Creek Crossing, during the time of inspection, the topsoil pile nearest to the access road was missing perimeter BMPs. The Operator has since sent a photo illustrating perimeter BMPs have been installed. All three topsoil piles have been seeded with straw mulch and a tackifier.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment It was observed that approximately 1 acre of area was disturbed in the "expanded" area and at the previous topsoil stockpile. Areas disturbed for construction expansion are still subject to Rule 1002.b.

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 Portions of the fill and cut slope remain bare without vegetation growth; monitor for vegetation growth throughout the season and conduct additional seeding, as needed.

Corrective Action Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND _____

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: It was observed in this inspection that the pad stabilization concerns, including cracks forming along the edge of southeastern fill slope have been addressed at this time. This CA has been resolved.</p> <p>Portions of the cut slope have vertical slopes without vegetation or other protective erosion measures. Portions of the perimeter ditch are no longer adequately functioning as stormwater BMPs and need to be maintained.</p>						Date: _____
<p>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.</p>						

Pits: NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>STORMWATER</p> <p>Staff inspected the Beaver Creek Crossing Construction. It was observed that the box culvert had been installed, with clear water moving through the creek. It was also observed that topsoil had been salvaged and placed into three different topsoil stockpiles. It appeared that a straw mulch had been added to all seeded areas, but may not have adhered or been sufficiently crimped on those piles. Straw appeared to be dense in some areas and bare in other areas; it appears the Operator may have implemented additional seeding with mulch since the Inspection occurred.</p> <p>Staff observed the vertical cut slope at the end of the crossing "road," which remained bare without any run-on BMPs. Staff voiced the concerns about the vertical cut slope to the Operator. The Operator sent photos to Staff on 4/28/2026 via email to illustrate that the vertical cut slope had been seeded and mulch.</p>	maxwell	04/10/2026
<p>TOPSOIL SALVAGE</p> <p>Previous inspections observed on 1,809 CY of topsoil had been salvaged during initial construction of the Location; pursuant to 1002.b, at least 3,908 CY should have been salvaged. NOAV #403890794 required Operator to import 2,099 CY of replacement topsoil.</p> <p>It was observed in this inspection that approximately 5,412 CY of topsoil material has been stockpiled; it appears Operator imported an additional 3,603 CY of material, 1,504 CY more than what was required by the State.</p> <p>It was also observed that approximately 431 CY of topsoil remains stockpiled along areas of the Beaver Creek Crossing.</p>	maxwell	04/28/2026

Attached Documents

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

Document Num	Description	URL
404640960	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7532671
712300298	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7532665