

**FORM  
INSP**Rev  
X/15**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:

09/30/2020

Submitted Date:

10/01/2020

Document Number:

700600162**FIELD INSPECTION FORM**Loc ID 324938 Inspector Name: Kosola, Jason On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10634Name of Operator: P O & G OPERATING LLCAddress: 5847 SAN FELIPE SUITE 3200City: HOUSTON State: TX Zip: 77057**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

**Findings:**3 Number of Comments1 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
Binschus, Chris		chris.binschus@state.co.us	
Colotta, Wendy	281-620-1993	wendy_colotta@pogresources.com	Production & Regulatory Associate
Smith, Mel		mel_smith@pogresources.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
467381	SPILL OR RELEASE	AC	09/09/2019		-	SPILL/RELEASE POINT	AC

**General Comment:**

This is a follow up inspection to document status of spill cleanup and final reclamation. At the time of this inspection Operator has made no attempt to clean up historic spill or conduct surface reclamation of well pad. Original Corrective Action date of 2/28/2019 remains in effect. Operator is advised that COGCC Corrective Action dates are as enforceable as COGCC rules. Failure to comply with Corrective Actions will result in financial penalty. Operator should immediately begin remediation of spill.

On 8/28/2019, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at PO&G Operations Lowe B-2 location, and the Petx-Lowe 1-A facility location in Kit Carson County, Colorado. This inspection was in response to Sundry #402122863 submitted by PO&G stating Final reclamation complete, site ready for inspection in accordance with 1004.c. Reclamation inspector issued 4 Corrective Actions that have yet to be resolved. Operator should refer to inspection 696200704 and complete the required Corrective Actions.

On 12/12/2019 Environmental Protection Specialist (EPS) Kosola conducted a follow up inspection to document status of spill clean up in COGCC inspection 700600040. EPS requested that operator submit results from spill investigation on inspection and called operator to discuss. No response was received.

On 9/14/2020 EPS Kosola contacted PO&G via email and again requested that the operator submit the results from spill investigation. Operator submitted Form 19 Supplemental documenting that a spill investigation was conducted and found contaminated soil. Operator then requested closure of spill but no clean up of spill was conducted. Form 19 was then sent back to DRAFT.

Operator shall submit Form 19 Supplemental documenting spill investigation. If contamination was discovered and a clean up is required then operator shall submit a Form 27 Remediation Plan to Area EPS Kosola documenting plan to clean up.

After completion of remediation operator shall conduct final reclamation of well pad as described in COGCC inspection 696200704



**Environmental****Spills/Releases:**Type of Spill: OTHER E&P WASTE

Estimated Spill Volume: \_\_\_\_\_

Comment: COGCC Inspection 696200704 documented historic release of crude oil and E&P waste buried on location. Operator had attempted to close location with no clean up of spill or final reclamation of location. Operator submitted Form 19 Initial reporting spill on 9/5/2019 but no follow up has been submitted. No remediation has been conducted and no reclamation of location has been attempted.

Corrective Action: Submit completed Form 19 Supplemental documenting investigation into the delineation of historic release. Operator shall fill out all data fields in Form 19 as appropriate.

Date: 10/02/2020Reportable: YES

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 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 \_\_\_\_\_

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 \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed \_\_\_\_\_

Gravel removed **Fail**

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

Compaction alleviation \_\_\_\_\_ 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: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date \_\_\_\_\_

Overall Final Reclamation **Fail** Well Release on Active Location ☐ Multi-Well Location ☐

**Attached Documents**

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

Document Num	Description	URL
402501332	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260434">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260434</a>
700600166	Inspection photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260427">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5260427</a>