

FORM  
INSPRev  
X/20

## 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:

03/23/2023

Submitted Date:

03/28/2023

Document Number:

708200074

### FIELD INSPECTION FORM

Loc ID 463256 Inspector Name: Edwardson, Dylan On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 10634  
Name of Operator: P O & G OPERATING LLC  
Address: 5847 SAN FELIPE SUITE 3200  
City: HOUSTON State: TX Zip: 77057

**Status Summary:**

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

**Findings:**

- 14 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
Pesicka, Conor		conor.pesicka@state.co.us	
Kosola, Jason		jason.kosola@state.co.us	
MOORE, CHRISTOPHER	713-244-0779	christopher_moore@pogresources.com	Principal Agent
RANDO, CHRIS		christopher_rando@pogresources.com	All Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
463256	Location	AC			-	Lowe 2-B	RI

**General Comment:**

This is an Interim Reclamation and Stormwater Inspection for Location ID (463256).

<b>Location</b>					
<b>Lease Road:</b>					
	Type	Access			
	comment:	Lease road has been excavated and is not accessible to Staff or emergency services. Refer to attached inspection photos.			
	Corrective Action:	Repair and maintain lease road to comply with rule 204.			Date: <u>04/30/2023</u>
Overall Good: <input type="checkbox"/>					
<b>Signs/Marker:</b>					
	Type	TANK LABELS/PLACARDS			
	Comment:	Tank labels (e.g. NFPA) are not legible as they are faded, peeling, or cracked. There are also two different emergency contact numbers listed on the signs, one of which is not legible. Refer to attached inspection photos for documentation.			
	Corrective Action:	Install sign to comply with Rule 605.g.			Date: <u>04/30/2023</u>
<b>Emergency Contact Number:</b>					
	Comment:	<input style="width: 100%;" type="text"/>			
	Corrective Action:	<input style="width: 100%;" type="text"/>			
Date: _____					
<b>Good Housekeeping:</b>					
	Type	DEBRIS			
	Comment:	Remnants of a shed are scattered throughout the location and is now considered trash/debris and will need to be disposed of. The debris/trash was observed in previous inspection (Doc #700600163) and it does not appear the operator has performed the corrective action. Refer to attached inspection photos for documentation.			
	Corrective Action:	Comply with Rule 606 and remove all debris and trash from location. The corrective action date is being back-dated to when the corrective action should have been performed.			Date: <u>10/08/2020</u>
	Type	UNUSED EQUIPMENT			
	Comment:	Unused equipment (e.g. pipe, tanks, and various metal fittings) were observed throughout the location and will need to be removed. The unused equipment was observed in previous inspection (Doc #700600163) and it does not appear the operator has performed the corrective action. Refer to attached inspection photos for documentation.			
	Corrective Action:	Comply with Rule 606 and removed any unused equipment. The corrective action date is being back-dated to when the corrective action should have been performed.			Date: <u>11/01/2020</u>
Overall Good: <input type="checkbox"/>					
<b>Spills:</b>					
	Type	Area	Volume		
In Containment: No _____					
	Comment:	<input style="width: 100%;" type="text"/>			
<input type="checkbox"/> Multiple Spills and Releases?					
<b>Equipment:</b>					
					corrective date
	Type: Other	#			
	Comment:	Loadout lines on tank are not capped or have a bullplug installed. Refer to attached inspection photos for documentation.			
	Corrective Action:	Comply with Rule 603.i and install cap/bullplugs on loadout lines.			Date: <u>04/30/2023</u>
<b>Tanks and Berms:</b>					
Contents	#	Capacity	Type	Tank ID	SE GPS

Comment:		
Corrective Action:		Date:

**Paint**

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient		Inadequate
Comment:	Earthen perimeter berm around tank does not appear adequate to contain 150% of tank volume. The berm is breached in several areas and there is evidence of animal burrows. Refer to attached inspection photos for documentation.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.(1).			Date: 04/30/2023

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

**Inspected Facilities**

Facility ID: 463256 Type: Location API Number: - Status: AC Insp. Status: RI

**Environmental**

**Spills/Releases:**

Type of Spill: OTHER E&P WASTE

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

Comment: Stained soil observed around equipment. Previous inspection conducted on 09/30/2020 (Doc #700600163) identified this stained soil and required cleanup with a corrective action; it does not appear the operator has performed any cleanup or remedial action to address this. Refer to attached inspection photos for documentation.

Corrective Action: Control and contain spills/releases and clean up per Rule 906.a. The corrective action date is being back-dated to when the corrective action should have been performed.

Date: 11/01/2020

Reportable: \_\_\_\_\_

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 [See "Good Housekeeping" sections comments.](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment [See "Good Housekeeping" sections comments.](#)

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 This location does not comply with Rule 1003. During this inspection, Staff observed that the location appears to be in disrepair with debris, trash, and unused equipment observed throughout. Undesirable vegetation (e.g. kochia) was observed in the interim areas and does not appear to have been managed. The operator will need to perform interim reclamation activities during the next local growing season. Refer to attached inspection photos for documentation.

Corrective Action Perform reclamation in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards. Corrective action date is the date the location was observed out of compliance.

Date 03/23/2023

Overall Interim Reclamation Fail

**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

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Pits:**  NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
403358942	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064837">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064837</a>
708200075	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064834">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064834</a>