

**FORM
INSP**Rev
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 FORMLoc 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).

Location					
Lease Road:					
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: 04/30/2023
Overall Good: <input type="checkbox"/>					
Signs/Marker:					
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: 04/30/2023
Emergency Contact Number:					
Comment:					
Corrective Action:					Date: _____
Good Housekeeping:					
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: 10/08/2020
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: 11/01/2020
Overall Good: <input type="checkbox"/>					
Spills:					
Type	Area	Volume			
In Containment: No					
Comment:					
<input type="checkbox"/> Multiple Spills and Releases?					
Equipment:					
Type: Other	#				corrective date
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: 04/30/2023
Tanks and Berms:					
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:

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 REVEGETATIONCropland

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064837
708200075	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6064834