

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

401463645

Date Received:

11/17/2017

FIR RESOLUTION FORM

CA Summary:

2 of 3 CAs from the FIR responded to on this Form

0 CA Completed
2 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10433

Name of Operator: LARAMIE ENERGY LLC

Address: 1401 SEVENTEENTH STREET #1400

City: DENVER State: CO Zip: 80202

Contact Name and Telephone:

Name: _____

Phone: () Fax: ()

Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Lorne C Precott</u>	<u>970 812 5311</u>	<u>lprecott@laramie-energy.com</u>
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<u>Spencer, Stan</u>		<u>stan.spencer@state.co.us</u>
<u>Fischer, Alex</u>		<u>alex.fischer@state.co.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 680102392

Inspection Date: 11/03/2017

FIR Submit Date: 11/17/2017

FIR Status: _____

Inspected Operator Information:

Company Name: LARAMIE ENERGY LLC

Company Number: 10433

Address: 1401 SEVENTEENTH STREET #1400

City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 335902

Location Name: CASCADE CREEK-66S97W Number: 4LOT 12 County: _____

Qtrqr: Lot 12 Sec: 4 Twp: 6S Range: 97W Meridian: 6

Latitude: 39.557240 Longitude: -108.218680

FACILITY - API Number: 05-045-00 Facility ID: 335902

Facility Name: CASCADE CREEK-66S97W Number: 4LOT 12

Qtrqr: Lot 12 Sec: 4 Twp: 6S Range: 97W Meridian: 6

CORRECTIVE ACTIONS:**2**  CA# 111028

Corrective Action: Wildlife has had access to Pit and it appears hoses with metal fittings are being used to discharge water into/out of Pit. Liner may be compromised. Operator needs to Contact West Environmental Supervisor, Alex Fischer & EPS, Stan Spencer to discuss Liner integrity/specs

Date: 12/01/2017

Response: FACTUAL REVIEW REQUESTBasis for Review: Action requested was already completed prior to the inspection

Operator Comment: This location was being used to store fresh water and is being decommissioned. Regular Pond 3 fluid sampling analysis (please see attached) demonstrates Non Detect (ND) for BTEX and other Table 910-1 criteria. After the inspection conducted 11/16/2016, COGCC Inspector Colby was made aware that contact had been established with EPS Stan Spencer regarding this location (as per the CA). Please see the attached email correspondence (dated 12/15/2016) that included Inspector Colby (via CC) which details the use of this Pond, the fact that it is being used to store fresh water and that regular analytical sampling is being conducted. As already noted, Laramie staff has already been in communication with Stan Spencer and Alex Fischer (via Mr Spencer) regarding the status of this location.

Additionally, and perhaps more importantly, this location is in the process of being decommissioned. Pumps and waterlines that are on location have been use draw all the fresh water from the Pond and to prepare for removal/disposal of the liner. Recent precipitation events have resulted in the accumulation of a few inches of water in the bottom of the Pond, this will be pumped out ASAP as part of the liner removal process. Portions of the fence have been knocked down in order to facilitate water and liner removal. We have recently collected samples of the precipitate/sediment at the bottom of the pond for final disposition of the liner at a licensed facility. Laramie had intended to finalize closure of this facility in the coming weeks. Laramie will remove the pumps, hoses and return the boundary fence to its previous condition prior to removal of the liner and backfill.

Regarding the 2013 Inspection Doc #663902099, all CAs were resolved (including repair of the fence) and a Form 42 was submitted 10/31/13 (Doc #400505406). The COGCC's assertion in the General Comments section of the most recent Inspection Doc 680102392 that "CA to repair fence had not been performed...", cannot be confirmed since no COGCC inspections were conducted for more than three (3) years from 8/30/2013 until 11/14/2016. This property is owned by Laramie and enjoys the benefits of cattle grazing leases. Because cattle have been known to press the perimeter of this location, Laramie staff monitors the fence condition and repairs it as necessary in order to prevent cattle from compromising the liner. The fence has been repeatedly damaged and repaired since the last inspection in 2016.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Decision is Not Approved. Emails do not address Current CA regarding liner integrity & specs. The basis for the Factual Review is not valid.

3  CA# 111029

Corrective Action: Repair & Maintain Fence. CA Date is left at CA Date from previous Inspection 12/23/16. Operator needs to contact West Environmental Supervisor, Alex Fischer & EPS, Stan Spencer to discuss bringing Pit into Compliance with 902 Rules; including Fencing required per Rule 902 d. by 12/1/17.

Date: 12/23/2016

Response: FACTUAL REVIEW REQUESTBasis for Review: Action requested was already completed prior to the inspection

Operator Comment: Same as above.

This location is in the process of being decommissioned. Pumps and waterlines that are on location have been use draw all the fresh water from the Pond and to prepare for removal/disposal of the liner. Recent precipitation events have resulted in the accumulation of a few inches of water in the bottom of the Pond, this will be pumped out ASAP as part of the liner removal process. Portions of the fence have been knocked down in order to facilitate water and liner removal. We have recently collected samples of the precipitate/sediment at the bottom of the pond for final disposition of the liner at a licensed facility. Laramie had intended to finalize closure of this facility in the coming weeks. Laramie will remove the pumps, hoses and return the boundary fence to its previous condition prior to removal of the liner and backfill.

This location was being used to store fresh water and is being decommissioned. Regular Pond 3 fluid sampling analysis (please see attached) demonstrates Non Detect (ND) for BTEX and other Table 910-1 criteria. After the inspection conducted 11/16/2016, COGCC Inspector Colby was made aware that contact had been established with EPS Stan Spencer regarding this location (as per the CA). Please see the attached email correspondence

(dated 12/15/2016) that included Inspector Colby (via CC) which details the use of this Pond, the fact that it is being used to store fresh water and that regular analytical sampling is being conducted. As already noted, Laramie staff has already been in communication with Stan Spencer and Alex Fischer (via Mr Spencer) regarding the status of this location.

COGCC Decision: **Not Approved**

COGCC
Representative:

COGCC
Supervisor:

Decision is Not Approved. It is clear Pit is not in compliance with the Rules. There is no documentation that the fence was repaired or maintained. It is clear from Inspector's observations in 2017 that the same fence sections as in the 2016 Inspection were down as well as many additional portions of the fence down & in disrepair around the Pit

OPERATOR COMMENT AND SUBMITTAL

Comment:

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Lorne C Prescott

Signed: _____

Title: Reg & Enviro Compliance

Date: 11/17/2017 8:17:37 PM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
401463645	FIR RESOLUTION SUBMITTED
401463647	Water Analyticals, Pond 3
401463648	Status to Spencer, Colby
401463649	Status to Spencer, Colby 2
401463650	CA Approved 12/15/16

Total Attach: 5 Files