

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

401455156

Date Received:

11/10/2017

## FIR RESOLUTION FORM

### CA Summary:

4 of 5 CAs from the FIR responded to on this Form

2 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

Ash, Margaret

Email

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### COGCC INSPECTION SUMMARY:

FIR Document Number: 680102381

Inspection Date: 11/03/2017

FIR Submit Date: 11/09/2017

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: 424970

Location Name: Cascade Creek Number: 604-12-13 Annex County: \_\_\_\_\_

Qtrqtr: Lot 16 Sec: 4 Twp: 6S Range: 97W Meridian: 6

Latitude: 39.553320 Longitude: -108.233320

### FACILITY - API Number: 05-045-00 Facility ID: 424970

Facility Name: Cascade Creek Number: 604-12-13 Annex

Qtrqtr: Lot 16 Sec: 4 Twp: 6S Range: 97W Meridian: 6

Latitude: 39.553320 Longitude: -108.233320

### CORRECTIVE ACTIONS:

1 ☒ CA# 110120

Corrective Action: Organize Supplies in a Workman like Manner; label liquids & semi-solids and store in secondary containment; dispose of deteriorated supplies that have become Trash/Debris. Keep doors of Storage Units and Equipment Stored on Site closed or secured Open as dictated by use.

Date: 11/16/2017

Response: CA COMPLETED

Date of Completion: 11/10/2017

Operator Comment: Containers have been closed and secured. Materials have been removed and/or organized as appropriate.

COGCC Decision: Approved pending re-inspection

COGCC Representative:

2 ☒ CA# 110121

Corrective Action: Clean/contain/protect Supplies & Equipment; remove from Location what has become Debris. CA Date remains at CA Date from Previous Inspection

Date: 07/04/2016

Response: CA COMPLETED

Date of Completion: 11/10/2017

Operator Comment: Debris has been removed as appropriate.

COGCC Decision: Approved pending re-inspection

COGCC Representative:

3 ☒ CA# 110122

Corrective Action: Conduct interim reclamation per the approved Variance Doc#400831952 "Operations Plan" last paragraph. CA Date remains at CA Date from previous Inspection

Date: 10/17/2016

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: As noted in the Inspection, a variance was approved 6-23-2016 and an additional an Interim Reclaim Variance has been submitted for this location (in order to accommodate a new drilling schedule). The final paragraph referenced in Corrective Action #3 specific to Operations Plan Doc 400831952 refers to Final Reclamation not Interim Reclamation. A Form 4 sundry has been submitted to address this ambiguity. Many of the areas noted in the inspection (related to interim reclamation) are portions of the Production Area. The slopes supporting Production Areas cannot be realistically delineated from the "surface" production areas. Thus, despite the assertions of the COGCC, these areas have been addressed as per the NTO for Interim Reclamation for Delayed Operations. Specifically, item III.a via stabilization and maintenance of the area by compaction. Photo 14 from the inspection package confirms this assertion because the slope is clearly stabilized and no evidence of erosion is visible. The inspection also fails to acknowledge the existence of a primary BMP in the form of a berm at the base of the slope (see Photo 14 & 15). Laramie intends to continue to use this location (as permitted by Garfield County) as a Storage/Laydown location. Laramie's continued use of this location is primarily intended to limit overall disturbance to this region.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Form 4 #401455181 will be moved to in process status, the approval rescinded, and the appropriate group will then conduct the review. Laramie submitted this Form 4 under "Documents Submitted" when it was actually a modification of conditions of approval on a variance.

This factual review requests was reviewed by supervisor and manager and is not approved.

5 ☒ CA# 110124

Corrective Action:

Date: 10/17/2016

Stabilize location, fill and cut slopes, per good engineering practises. Recommend that Operator incorporate Stormwater controls with interim reclamation activities. Refer to the Operations Summary, Doc#400831952 for minimum requirements. CA Date is from Previous Inspection, 10/17/16 due to activities having not been conducted.

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: This location is regularly inspected and monitored as part of Laramie's field wide Storm Water Protection Management Plan. As demonstrated by the lack of erosion and sediment migration the current fill and cut slopes are stabilized according to good engineering practices. Since the last COGCC inspection this location has been exposed to Spring, Summer and Fall precipitation events. There is no evidence in the COGCC photos accompanying this inspection of significant erosion or sediment migration. To the contrary, Photo 14 from the inspection package confirms this assertion because the slope is clearly stabilized and no evidence of erosion is visible. The established BMPs at this location include compaction, benching and a primary berm BMP (to prevent soil migration) at the base of the slope. The use of benching is evidenced in Photo 7 from document 680100874 and in Photos 14 & 16 from document 680102385.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Form 4 #401455181 will be moved to in process status, the approval rescinded, and the appropriate group will then conduct the review. Laramie submitted this Form 4 under "Documents Submitted" when it was actually a modification of conditions of approval on a variance.

This factual review requests was reviewed by supervisor and manager and is not approved.

#### 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: 11/10/2017 10:23:24 AM

#### **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>
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401455156	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files