

**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:

01/08/2020

Submitted Date:

01/09/2020

Document Number:

698100118**FIELD INSPECTION FORM**Loc ID 425510 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10433Name of Operator: LARAMIE ENERGY LLCAddress: 1401 SEVENTEENTH STREET #1401City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:9 Number of Comments7 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
, Laramie		cogccnotifications@laramie-energy.com	All Inspections
Heil, John		john.heil@state.co.us	
Chris, Clark		cclark@Laramie-Energy.com	
Fischer, Alex		alex.fischer@state.co.us	
Prescott, Lorne	(970) 812-5311	lprescott@laramie-energy.com	
Pesicka, Conor		conor.pesicka@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
441238	CENTRALIZED EP WASTE MGMT FAC	AC	06/17/2015		-	HARRISON CR WTR TRMENT FAC IMPOUND 441238	EI
466150	SPILL OR RELEASE	AC			-	HCWTF Pond 4 4	EI

General Comment:

COGCC Environmental Inspection conducted by EPS staff S. Arauza and J. Heil. Follow up to 4/9/2019 Field Inspection Report doc #681701205 and Remediation Project #11939. Weather conditions during inspection were sunny with approximately 1 foot of snow covering the facility. Snow coverage on west, south, and east sides of all pits prevented inspection for liner integrity issues. See photos.

Operator has installed "Fresh Water Discharge" sign at outlet from Pond 4 Dewatering system to stormwater ditch in response to 4/9/2019 FIR.

Where Corrective Actions from 4/9/2019 FIR have not been adequately addressed, Corrective Action dates are left unchanged.

Inspected Facilities							
Facility ID:	<u>441238</u>	Type:	<u>CENTRALIZE</u>	API Number:	<u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID:	<u>466150</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Spill/Release ID #466150 was reported to the COGCC on 7/15/2019 for a leak detected in Pond 4 on 7/4/2019. Operator has not provided any spill updates since 7/25/2019 supplemental report (doc #402122392).

Corrective Action: Immediately provide for Spill/Release Point ID #466150 via a Supplemental eForm 19. Supplemental eForm 19 shall address COAs listed on previously-approved eForm 19s (docs #402109564 and #402122392).

Date: 01/31/2020

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: _____

Spill/Remediation:

Comment: Remediation Project #11939 has been assigned to document operator's delineation and remediation efforts in response to Spill ID #456666. Operator was required to submit a project update via a Supplemental eForm 27 no later than 5/22/2019 as a Corrective Action on 4/9/2019 FIR (doc #681701205). The required eForm 27 has not been received as of 1/9/2020.

Corrective Action: Operator shall immediately submit an eForm 27 update to Remediation Project #11939. Supplemental F27 Project Update shall address COAs listed on previously-approved F27s (doc #401777422 and #401833896).

Date: 05/22/2019

Emission Control Burner (ECB): _____

Comment:

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

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 PITType: Produced WaterLined: YESPit ID: Lat: 39.267206Long: -107.751023Reference Point: SEOther: Length: 470Width: 340**Lining:**Liner Type: Liner Condition: Comment:

Pond 2: Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.

Corrective Action:

Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."

Date: 06/22/2019**Fencing:**Fencing Type: Fencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Netting Condition: Comment: Corrective Action: Date: Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard: Comment: Corrective Action: Date: Type: Produced WaterLined: YESPit ID: Lat: 39.268910Long: -107.751188Reference Point: SEOther: Length: 60Width: 300**Lining:**Liner Type: Liner Condition: Comment:

Pond 3: Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.

Corrective Action:

Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."

Date: 06/22/2019**Fencing:**Fencing Type: Fencing Condition: Comment: Corrective Action: Date:

Netting:			
Netting Type:		Netting Condition:	
Comment:	Operator was required to investigate pit liner bulge and to provide investigation results no later than 5/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. Operator indicated that this CA was completed via FIRR doc #402149596, but did not attach information specific to Pond 3.		
Corrective Action	Investigate pit liner bulge/bubble at inlet on east side of 'Pond 3,' provide investigation results via Field Inspection Resolution Form or, if a spill or release is detected, an eForm 19.		Date: 05/22/2019
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:	
Comment:			
Corrective Action	Date:		
Type: <u>Water Fresh</u>	Lined: <u>YES</u>	Pit ID:	Lat: <u>39.269975</u> Long: <u>-107.751975</u>
Reference Point: <u>SE</u>	Other: _____	Length: <u>680</u>	Width: <u>370</u>
Lining:			
Liner Type: <u>HDPE</u>		Liner Condition:	
Comment:	Pond 4. Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.		
Corrective Action	Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."		Date: 06/22/2019
Fencing:			
Fencing Type:		Fencing Condition:	
Comment:			
Corrective Action	Date:		
Netting:			
Netting Type:		Netting Condition:	
Comment:			
Corrective Action	Date:		
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:	
Comment:	Fluids visible on pit during inspection, Spill/Release Point ID #466150 documents fluid accumulation in leak detection sump with no documentation of repairs made.		
Corrective Action	Submit documentation of pit operations for Pond 4 via an FIRR. Operator shall include documentation of liner repair and date(s) that fluids were reintroduced to pit.		Date: 02/09/2020

Attached Documents

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

Document Num	Description	URL
402281752	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5033321
698100119	20201008 field photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5033315