

**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:

12/08/2020

Submitted Date:

12/23/2020

Document Number:

696202124**FIELD INSPECTION FORM**Loc ID 424970 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10433Name of Operator: LARAMIE ENERGY LLCAddress: 1401 17TH STREET SUITE #1400City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:8 Number of Comments3 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
Lutz, Deborah		debbie.lutz@state.co.us	
Arauz, Steven		steven.arauza@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
, Laramie		cogccnotifications@laramie-energy.com	All Inspections
,		dnr_cogccenforcement@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
424970	LOCATION	AC			-	CC 604-12-13 Annex	RI

General Comment:

On 12/8/2020, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Laramie Energy LLCs CC /604-12-13 Annex location in Garfield County, Colorado.

This inspection is a follow-up to inspection #692401694 and #696201252 to document compliance for the following corrective actions:

1003: Conduct interim reclamation by 3/16/2020

1002.f: Install or repair required stormwater BMPs by 10/17/2016

It was observed that the Location remains out of compliance with COGCC Rules, corrective actions and Form conditions.

Refer to the "Environmental", "Reclamation" and "Stormwater" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Environmental**Spill/Remediation:**

Comment: Remediation Project #14276 regarding cuttings management remains open and no additional documentation regarding the project has been submitted since the Initial Form 27 #402192048 on 09/27/2019; This Location is out of compliance with several required conditions attached to Project #14276, and Sundry #401996189:

-Operator was required to submit the Initial Form 27 within 45 days of approval of Sundry #401996189 (8/12/2019), Operator did not submit the Initial Form until 9/27/2019.

-Operator was required to submit Supplemental Form 27s, at a minimum on a quarterly basis; The first Supplemental Form 27 should have been submitted no later than 11/12/2019; No supplemental 27s have been submitted.

-Operator was required to notify Environmental Protection Specialist (EPS) Arauza 72 hours prior to collecting drill cuttings samples. Per EPS Arauza, no notice of collecting drill cuttings samples was provided.

Corrective Action: Immediately contact Environmental Protections Specialist S. Arauza (steven.arauza@state.co.us), and submit required Supplemental Form 27(s).

Date: 11/12/2019

Emission Control Burner (ECB): _____

Comment: _____

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

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

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 _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

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

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions. See COGCC Comments for comments regarding reclamation.

In addition to reclamation issues observed, it is also noted that bonding requirements for the Location have not been met. See COGCC Comments for comments regarding financial assurance.

Corrective Action

There are two corrective actions being provided in this inspection:

1) Comply with 1003 Interim Reclamation Rules and corrective actions. The original CA date of 03/16/2020 remains applicable.

2) Comply with Form 4 conditions and immediately submit the required financial assurance of \$534,900.00.

Date **03/16/2020**Overall Interim Reclamation **Fail****Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

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: [See COGCC Comments for comments regarding Stormwater](#)Corrective Action: [Install or repair required BMPs in accordance with Rule 1002.f](#)

Date: 10/17/2016

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
RECLAMATION COMMENTS Previous inspections documented that areas not needed for production on the Location have not been reclaimed, or reclamation has not been completed. Inspections required Operator to perform interim reclamation activities in accordance with 1003 rules by 3/16/2020. It was observed in this inspection that interim reclamation of disturbed areas no longer in use has not been completed in accordance with 1003 rules; Revegetation/seeding activities have not been conducted in accordance with Rule 1003.e.(2). Interim reclamation of the Location has not been completed in accordance with 1003 Rules. Corrective action and date remains applicable.	trujilloam	12/22/2020
FINANCIAL ASSURANCE COMMENTS Pursuant to Form 4 #401996189 conditions, Operator was required to submit additional reclamation financial assurance of \$534,900.00 by August 28th, 2019. Operator submitted bonding incorrectly for an Individual E&P Waste Facility on 8/3/2020; This bond was released back to the Operator on 11/19/2020; it was the COGCC's expectation that the Operator would immediately resubmit as an "Interim Reclamation Plugging" bond as directed. In email communication between COGCC Financial Assurance Staff and Laramie (Kari Tofte) on 9/10/2020, Operator provided notice that work was in process to resubmit the bond. Laramie (Wayne Bankert) also provided verbal notice on 12/12/2020 to COGCC Environmental Staff that the bond was submitted. As of 12/23/2020, COGCC has not received the required additional financial assurance of \$534,900.00.	trujilloam	12/22/2020

STORMWATER COMMENTS

trujilloam

12/22/2020

Previous inspections documented that stormwater and erosion control BMPs are missing, or insufficient to stabilize and protect the Location. Inspections required Operator to comply with Rule 1002.f by 10/17/2016.

It was observed in this inspection that BMPs remain missing, or insufficient; Operator installed erosion blankets on a portion of the eastern fill slopes; BMPs remain missing or insufficient on remaining areas of the eastern/southern slopes. BMPs remain missing or insufficient to protect/stabilize slopes on the western areas of the Location. Cracking on the western area of the Location remain evident, indicating soil stabilization issues remain. BMPs along access road have not been installed in accordance with good engineering practices.

Attached Documents

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

Document Num	Description	URL
402560380	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5316126
696202125	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5316115