

**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:

11/08/2021

Submitted Date:

11/16/2021

Document Number:

693903863**FIELD INSPECTION FORM**Loc ID 325172 Inspector Name: ROY, CATHERINE On-Site Inspection ☐ 2A Doc Num: **Operator Information:**OGCC Operator Number: 10679Name of Operator: LOGOS OPERATING LLCAddress: 2010 AFTON PLACECity: FARMINGTON State: NM Zip: 87401**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
,		regulatory@logosresourcesllc.com	<a href="#">All Inspections 8/2/2021</a>
Trujillo, Aaron		aaron.trujillo@state.co.us	
Rowley, Darren		drowley@logosresourcesllc.com	<a href="#">All inspections</a>
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
214194	WELL	PR	05/19/2010	GW	067-05515	BONDAD 33-9 5	RI

**General Comment:**

On 11/8/2021 Catherine Roy conducted a followup reclamation and stormwater inspection in response to stormwater erosion and discharges into waters of the state observed in July 2021 on locations mapped within the FEMA floodplain and Aquatic Native Species Conservation Waters.

During this inspection the following compliance issues were observed:

-Corrective action to submit and implement a stormwater plan is not addressed. A stormwater plan was not submitted per the corrective action. Measures taken such as removal of debris and placement of cobble around partially buried vessel and at low water crossing, are not adequate to ensure sight stabilization during a stormwater event. Cobbles are permeable and will easily wash away during a stormwater event similar to what was observed in July. Metal containment around submerged tank was also shown to be permeable as stormwater flows eroded beneath and through the barrier.

To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing. As described in the 7/29/2021 inspection, the plan needs to demonstrate that stormwater flows will be properly diverted and that the location will be protected from degradation. The plan needs to describe how all inlets and outlets will be properly designed and constructed to ensure stabilization. Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

-Corrective action to submit a shut-in plan per rule 421.b. is not addressed as a shut-in plan is not submitted. Per the rule, the operator needs to submit the plan when requested. Corrective action is back-dated to original corrective action date (8/2/2021) to document duration of non-compliance for enforcement purposes.

-Per Rule 406.e., operator needs to install wildlife/livestock protection around the wellhead cellar to prevent accidental access, by 11/30/2021.

See below, and attached photos for additional detail.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:	Open cellar observed around wellhead can result in potential wildlife/livestock entrapment or injury.		
Corrective Action:	-Per Rule 406.e., operator needs to install wildlife/livestock protection around the wellhead cellar to prevent accidental access, by 11/30/2021.		Date: <u>11/30/2021</u>
Type:	#		
Comment:	Flood shut in plan not submitted per 7/29/2021 corrective action.  -Operator needs to ensure that all equipment is anchored per the 421.b. floodplain rules.		
Corrective Action:	-Per Rule 421.b. submit as an attachment to a Form 4, Operator's Flood Shut-In Plan by 8/2/2021.		Date: <u>08/02/2021</u>

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	214194	Type:	WELL	API Number:	067-05515	Status:	PR	Insp. Status:	RI

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**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: Per communication with Jim Hughes, area environmental specialist, and onsite assessments it is apparent that E&P waste management activities in July 2021, were not in compliance with Rule 905.a.(2), and that reporting is not consistent with 912.b., as contents of the partially buried vessel threatened waters of the state during the July 2021 storm event.

Corrective Action: \_\_\_\_\_

Date: \_\_\_\_\_

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****Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: It is apparent that eroded well pad material from July 2021 inspection was washed downstream into the Florida River (Waters of the State) as extensive scouring was observed across the well pad and to the downstream bank of the river.

Corrective Action: Corrective action to submit and implement a stormwater plan is not addressed. A stormwater plan was not submitted per the corrective action. Measures taken such as removal of debris and placement of cobble around partially buried vessel and at low water crossing, are not adequate to ensure sight stabilization and do not demonstrate good engineering practices. To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing. Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

Date: 07/29/2021

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

Type:	Lined:	Pit ID:	Lat:	Long:
Reference Point: _____	Other: _____	Length: _____	Width: _____	

**Lining:**

Liner Type:

Liner Condition:

Comment: COGCC considers open-top partially buried vessels (PBV) such as the PBV within the project area, as a pit. As such, these need to be constructed, maintained, and operated according to Rule 909. Specifically, the onsite PBV needs to be maintain with 2ft of freeboard per Rule 909.c.

Corrective Action

Date:

**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:

**Attached Documents**

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

Document Num	Description	URL
402872524	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582545">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582545</a>
693903882	Inspection Photos 7-29-2021	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582539">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582539</a>

693903883	Inspection Photos 11-8-2021	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582540">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582540</a>
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