

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10679
Name of Operator: LOGOS OPERATING LLC
Address: 2010 AFTON PLACE
City: FARMINGTON State: NM Zip: 87401

Findings:

- 8 Number of Comments
- 3 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	All Inspections 8/2/2021
Trujillo, Aaron		aaron.trujillo@state.co.us	
Rowley, Darren		drowley@logosresourcesllc.com	All inspections
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

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:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582545
693903882	Inspection Photos 7-29-2021	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582539

693903883

Inspection Photos 11-8-
2021

<http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582540>