

**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:

09/07/2022

Submitted Date:

09/08/2022

Document Number:

696204050

FIELD INSPECTION FORMLoc ID 481742 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10433

Name of Operator: LARAMIE ENERGY LLC

Address: 1700 LINCOLN ST STE 3950

City: DENVER State: CO Zip: 80203

Status Summary:

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

Findings:

15 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
, Laramie		cogccnotifications@laramie-energy.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479533	CENTRALIZED EP WASTE MGMT FAC		03/03/2021		-	Annex Cuttings Facility 479533	CI

General Comment:

On 9/7/2022, Reclamation Specialist Trujillo conducted a stormwater and construction inspection at Laramie Energy's Annex Cuttings Facility 479533 location in Garfield County, Colorado.

This inspection is in response to Form 42 (#403152870) "Notice of Construction" stating construction commenced 9/5/2022; it was observed that soil salvage operations were in process at time of inspection.

The following compliance issues were observed during this inspection:

- Stormwater
- Oil and Gas Location Signage not posted at Location entrance
- Location assessment not posted at Location

Refer to the "Construction", "Location" and "Reclamation" 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.

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	It was observed in this inspection that signage for the Annex Cuttings Facility Location was not posted at the Location entrance.		
Corrective Action:	Comply with 605.a. A CA date of 9/5/2022 is being provided, as signage was required to be posted at the location entrance at time of construction.	Date:	09/05/2022

Emergency Contact Number:

Comment:		Date: _____
Corrective Action:		

Overall Good: ☐

Spills:					
Type	Area	Volume			

In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 481742 CDP: _____

Comment: It was observed in this inspection that a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, was not posted on Location.

Corrective Action: Comply with 406.c. A CA date of 9/5/2022 is being provided as the Location Assessment was required to be posted upon commencement of operations.

Date: 09/05/2022

Form 2A COAs:

Comment:		Date: _____
Corrective Action:		

Wildlife BMPs:

Comment:		Date: _____
Corrective Action:		

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
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WADDLES	Yes		
Comments: Erosion BMPs: Erosion logs were observed along the perimeter of the Location. BMPs appear to be in proper functioning condition at time of inspection.			
Other BMPs:			
Corrective Action:		Date:	
RETENTION PONDS	No		
Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies that a sediment trap/pond will be constructed on the NE end of the Location; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.			
Other BMPs:			
Corrective Action:		Date:	
DITCHES	No		
Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies that a ditch/berm will be constructed along the eastern perimeter of the Location to divert stormwater to a sediment trap; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.			
Other BMPs:			
Corrective Action:		Date:	
	No	Vehicle Trakcing	No
Comments: Erosion BMPs: It was observed in this inspection that BMPs to mitigate fugitive dust, or minimize tracking and sediment transport was missing or insufficient; offsite sediment transport from road evident; soils along access road loose/powdery and at risk to wind erosion; application of freshwater to dried soils not observed; water truck not observed on site or within immediate areas.			
Other BMPs:			
Corrective Action: Comply with Rule 1002.f.(2) and implement BMPs to minimize erosion, degradation and sediment transport from operational roads, well pads, and other unpaved surfaces. Comply with Form 2A #402585327 COA #10, as well as Form 4 #403070576 Rule 1002.f conditions.		Date: 09/12/2022	
SILT FENCES	No		
Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies silt fence to be used along perimeter of the Location to manage runoff; silt fence not observed at time of inspection. Operator appears to be utilizing erosion logs in lieu of fence.			
Other BMPs:			
Corrective Action:		Date:	
BERMS	No		
Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies that a ditch/berm will be constructed along the eastern perimeter of the Location to divert stormwater to a sediment trap; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.			
Other BMPs:			
Corrective Action:		Date:	

	No		
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Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies that a sediment trap w/ 6-inch outlet pipe will be constructed along the eastern end of the cuttings treatment management area; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.

Other BMPs:

Corrective Action: _____ Date: _____

Comment: "Stormwater Management Plan" #402859117 suggests Operator will "construct ditch/berm w/ (with) topsoil". Pursuant to Form 4 #403070576 Conditions of Approval, ensure topsoil material is not utilized in the installation of any stormwater control measures (e.g. use during construction of a ditch and berm, sediment trap); the use of topsoil material as part of stormwater controls do not comport with Rule 1002.c. See "COGCC Comment" for addition topsoil comment.

Corrective Action: **Date:** _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

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 _____ In _____

Comment _____

Soil salvage operations were "in process" at time of inspection; Operator estimates approximately 5,050 cy of topsoil will be salvaged. Ensure all topsoil is salvaged, stored and protected in accordance with Rule 1002.b.(2) and 1002.c.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process _____

Comment _____

Soil salvage operations were "in process" at time of inspection; Ensure all topsoil is salvaged, stored and protected in accordance with Rule 1002.b.(2) and 1002.c.

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 _____

Corrective Action _____ Date _____

Overall Interim Reclamation**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 ☐

COGCC Comments

Comment	User	Date
TOPSOIL COMMENT If topsoil is to be left as a berm along the eastern perimeter of the Annex Location, Operator shall ensure BMPs are implemented so that topsoils remain properly segregated, and do not function as part of stormwater controls on the Location; BMPs to stabilize, and protect the topsoil stockpiles from wind and water erosion, as well as to protect from commingling with subsoils from the fill slope, and sediment transported/deposited from stormwater runoff will be required.	trujilloam	09/08/2022

Attached Documents

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

Document Num	Description	URL
696204051	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5851262