

**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:

08/04/2023

Submitted Date:

08/07/2023

Document Number:

696205144

FIELD INSPECTION FORMLoc ID 383264 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:

14 Number of Comments

5 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
Arauza, Steven		steven.arauza@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

General Comment:

On 8/4/2023, Reclamation Specialist Trujillo inspected Laramie Energy LLC's Cascade Creek (CC) 010-21-41 location in Garfield County, Colorado.

Frac and completion operations were observed to be "in process" at time of inspection. Operator on site accompanied Reclamation Specialist during inspection, and was provided notice of compliance issues observed and documented within this inspection.

This inspection is a follow-up to #696205104 to document compliance with the following corrective actions:

- Materials handling and spill prevention procedures and practices
- Stormwater
- Labeling
- Wildlife Protection Devices
- Cuttings management / 34-60-121(1) CRS-b: Permit Violation

It was observed in this inspection that the Location remains out of compliance with ECMC Rules, Corrective Actions and Permit Conditions.

The following new compliance issues were observed during this inspection:

- Weed establishment on Topsoil Stockpiles
- Stormwater
- Spills / Impacted Soils

Refer to the "Location", "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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

LocationOverall Good: ☐

Signs/Marker:			
Type	WELLHEAD		
Comment:	Signage required within 60 days of completion.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	Inspection #696205104 observed that the required labels/signage at the four tanks at the battery facility were not posted in accordance with Rule 605.h. It was observed that Operator has installed labels on the rear of the tanks; corrective action is being considered resolved at this time.		
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Signage required within 60 days after installation of tank battery. Tank battery has been installed on the north end of the Location; battery lacks signage.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 1-800-891-6191 / 911

Corrective Action:

Date: _____

Overall Good: ☐

Spills:			
Type	Area	Volume	
Comment:	Stained soils observed along the western areas of the Working Pad surface.		
Corrective Action:	Clean/remediated soils to Table 915-1 cleanup standards.		Date: 08/04/2023

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		
Comment:	Previous inspection observed that Wildlife protection equipment missing or insufficient at the VOC Knockout equipment secondary containment BMP. It was observed in this inspection that wildlife protection BMPs have been installed. This CA has been resolved.		
Corrective Action:		Date:	

Venting:

Yes/No

Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Drill Cuttings		Inadequate		
Comment	See "Comment #1" at the end of this report.			
Corrective Action	<p>Comply with Rule 1002.f and Form 2A COAs.</p> <p>This issue is now also being considered a Spill. Contact NW EPS Arauza, or EPS Supervisor Alex Fischer (alex.fischer@state.co.us) for Form 27 remediation, and possible Form 19 Spill reporting requirements, for areas beyond the Working Pad Surface of the Location impacted by drill cutting E&P waste; this issue is being considered for enforcement.</p>			Date: 07/14/2023

Spill/Remediation:

Comment:	<p>Pursuant to Form 2A #402609499, "cuttings will be treated and disposed onsite (along the cut portion at grade, no trench or pit will be used) or at the ACF, a E&P Waste Management Facility proposed in the OGD".</p> <p>Previous inspection observed that no Form 27 related to the remediation and management of drill cuttings on the Location has been submitted; inspection required Operator to contact NW EPS.</p> <p>Unable to find records of a Form 27 having been filed; no records or documentation within a FIRR have been provided by Operator to indicate this CA has been addressed, and Environmental Staff has been contacted regarding the compliance issues.</p> <p>This CA will remain applicable.</p>		
Corrective Action:	<p>Contact NW EPS Arauza (steven.arauza@state.co.us), or Western EPS Supervisor Alex Fischer (alex.fischer@state.co.us).</p>		Date: 07/14/2023

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 _____ Fail _____

Comment _____

It was observed in this inspection that BMPs, including weed management activities, to prevent weed establishment at the topsoil stockpiles on the Location are inadequate; desirable vegetation not observed on stockpiles; vegetation is predominantly undesirable weedy plant species such as Tumble Mustards, Compass plant, Cheatgrass, etc...

Corrective Action _____

Comply with Rules 606.c and 1002.c.

Date **08/04/2023**

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 ☐

Storm Water:

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

Comment: Inspection #696205104 observed that BMPs to prevent or contain a spill at the porta-john units were missing or insufficient. It was observed in this inspection that the units have been secured to prevent a spill. CA has been addressed.

It was observed in this inspection that silt fence, and erosion logs (straw wattles) on the Location, including at the topsoil stockpiles, have not been maintained in accordance with good engineering practices, and are in disrepair.

Corrective Action: Comply with Rule 1002.f; install or repair required stormwater and erosion control BMPs in accordance with good engineering practices.

Date: 08/04/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	435020	400389975	
	291973	1433709	
	435020	400389975	

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>Pursuant to Form 2A #402609499 Conditions of Approval ("COAs"):</p> <p>-Stormwater control measures will include perimeter controls and site degradation control measures; these will include a minimum 1.5-foot compacted earthen perimeter berm... around the cuttings management area along the northern (cut slope) edge of the WPS;</p> <p>-Drill cutting storage will be stockpiled on the edge of location against the cut slope of a pad (if available) segregated from all topsoil and vegetation. Appropriate storm water drainage will be in place and the cuttings storage area will have a berm at the base to prevent any storm water run-off from exiting the pad or spreading to the rest of the pad outside of the designated area;</p> <p>-All cuttings generated during drilling will be kept in a bermed portion of the well pad prior to disposition offsite.</p> <p>Inspection #696205104 observed in this inspection that BMPs to prevent or contain a spill at the cuttings management area along the north end of the Location have not been installed or maintained; drill cuttings lack containment measures. Inspection required Operator to comply with Rule 1002.f and Form 2A permit conditions and requirements.</p> <p>It was observed in this inspection that Operator has attempted to install a containment berm at the southern base of the drill cutting materials; berm has not been installed in accordance with good engineering practices, and is inadequate to contain a spill or release; additionally, the berm has not been properly consolidated.</p> <p>It was also observed in this inspection that Operator has pushed cutting material beyond the cut-slope and designated working pad surface on the north end of the Location, impacting vegetation and potentially topsoil.</p> <p>This Location remains out of compliance with corrective actions and Form 2A permit conditions.</p>	trujilloam	08/07/2023

Attached Documents

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

Document Num	Description	URL
696205145	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210672