

**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 FORM**Loc 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
Arthur, Denise		denise.arthur@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arauz, Steven		steven.arauza@state.co.us	
, Laramie		cogccnotifications@laramie-energy.com	All Inspections

**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.

**Location**Overall Good: ☐**Signs/Marker:**

Type	BATTERY		
Comment:	<p>Singage required within 60 days after installation of tank battery.</p> <p>Tank battery has been installed on the north end of the Location; battery lacks signage.</p>		
Corrective Action:		Date:	
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:	<p>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.</p> <p>It was observed that Operator has installed labels on the rear of the tanks; corrective action is being considered resolved at this time.</p>		
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:	<p>Previous inspection observed that Wildlife protection equipment missing or insufficient at the VOC Knockout equipment secondary containment BMP.</p> <p>It was observed in this inspection that wildlife protection BMPs have been installed.</p> <p>This CA has been resolved.</p>		
Corrective Action:		Date:	

**Venting:**

Yes/No		
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Inspector Name: Trujillo, Aaron

Comment:		
Corrective Action:		Date:
<b>Flaring:</b>		
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&amp;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&amp;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:	Contact NW EPS Arauza (steven.arauza@state.co.us), or Western EPS Supervisor Alex Fischer (alex.fischer@state.co.us).		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 REVEGETATION**Cropland

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

**COGCC Comments**

Comment	User	Date
<p><b>COMMENT #1</b></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
403488857	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210676">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210676</a>
696205145	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210672">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210672</a>