

**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:

11/06/2023

Submitted Date:

11/09/2023

Document Number:

696205412

FIELD INSPECTION FORM

Loc ID 481743	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 12 Number of Comments 2 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested																																																																																																																																																																
Operator Information: OGCC Operator Number: 10433 Name of Operator: LARAMIE ENERGY LLC Address: 1700 LINCOLN ST STE 3950 City: DENVER State: CO Zip: 80203				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE																																																																																																																																																																
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General Comment: <div style="height: 40px; border: 1px solid black;"></div>																																																																																																																																																																				

On 11/6/2023, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction at Laramie Energy LLC's Cascade Creek (CC) 0697-15-08 location in Garfield County, Colorado.

This inspection is a followup to #696205142 and #696205253 to document compliance with the following corrective actions:

- Location Assessment Posting Requirements
- Location Signage
- Permitted Location Assessments COA Requirements
- Topsoil Salvage and Protection requirements
- Stormwater

This inspection is also in response to Resolution Nos. 403568815 and 403568798 stating corrective actions have been completed.

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. A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location Construction

Location ID: 481743 CDP: _____

Comment: Location signage and permit information posted at Location entrance.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
	Yes		

Comments: Erosion BMPs: Pursuant to the permitted Form 2A #402609520 "Stormwater Management Plan", and Form 2A "Conditions of Approval", stormwater controls will include a collection trench with drains to a sediment catchment system with a 6-inch outlet pipe in the northwestern portion of the WPS. Outlet protection will be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow.

Other BMPs: Previous inspection observed that two slopes drains have been implemented on the western perimeter; control measures lacked a properly armored/engineered outlet per good engineering practices.

It was observed in this inspection that proper outlet protection, per good engineering practices, remain missing from the slope drains on Location.

This CA remains applicable.

Corrective Action: BMP has not been installed in accordance with good engineering practices, or per the Form 2A #402609520 "Stormwater Management Plan", and Form 2A "Conditions of Approval", CA remains applicable:

Date: 08/04/202
3

Comply with Rule 1002.f, Form 2A permit condition requirements, and the Form 2A permit Stormwater Management Plan; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.

RETENTION PONDS	Yes		
Comments: Erosion BMPs: Pursuant to the permitted Form 2A #402609520 "Stormwater Management Plan", and Form 2A "Conditions of Approval", stormwater controls will include diversion ditches along the base of the fill slopes and will tie into two sediment trap systems on the south side and one sediment trap system on the north side. Per the SWMP, the sediment trap control measures were to include a "chase" (outlet).			
Other BMPs: It was observed in this inspection that sediment traps (2 on the east perimeter, 1 western perimeter) have been constructed with armored inlets/outlets. Unclear at time of inspection if controls have been constructed with geotextile lining in conjunction w/ rip-rap armoring. No further actions will be required at this time.			
Corrective Action:		Date:	
WADDLES			
Comments: Erosion BMPs: Erosion logs installed between the toe of the topsoil stockpiles, and the toe of the fill slopes.			
Other BMPs:			
Corrective Action:		Date:	
DITCHES	Yes		
Comments: Erosion BMPs: Stormwater diversion ditches at base of fill slopes constructed in conjunction w/ rocked check dams. Diversion ditches also constructed in conjunction with sediment traps to manage stormwater and sediment prior to off-site discharge.			
Other BMPs:			
Corrective Action:		Date:	
	Yes		
Comments: Erosion BMPs: Hydromulch on fill slopes			
Other BMPs:			
Corrective Action:		Date:	

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:	

Inspected Facilities				
Facility ID: <u>481743</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482542</u>	Type: <u>WELL</u>	API Number: <u>045-24518</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
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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 [3-strand barbed wire fence installed along the Location's perimeter. Cattle guard and gate installed at location entrance.](#)

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process _____

Comment [See "COGCC Comments" at the end of this report.](#)

Corrective Action _____

[Comply with Rules 1002.f and 1002.c: Install or repair stormwater and erosion control measures at the topsoil stockpiles along the eastern perimeter of the Location. Ensure BMPs are installed in accordance with good engineering practices, and maintained in proper functioning condition](#)Date **11/06/2023**

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

Pursuant to the "Notice to Operators: Interim Reclamation Procedures for Delayed Operations", Delayed operations may occur if an Operator constructs a well location, but does not drill any wells.

The Location has been constructed- continuous operations (drilling or subsequent operations) not occurring.

Pursuant to Form 42 #403200034, "construction is anticipated 10/20/2022 - 11/20/2022"; it has been ~11 months since last Operations appear to have occurred on the Location. Drilling operations or compliance with the NTO required by 11/20/2023.

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 PROTECTION COMMENTS	trujilloam	11/09/2023
<p>Pursuant to the permitted Form 2A #402609520 Conditions of Approval, site degradation control measures will include slope stabilization of the topsoil stockpiles (seeding, mulching, surface roughening); Topsoil will be stored within a stockpile along the eastern edges of the location, outside of the Working Pad Surface, and will be segregated from all subsurface material; to minimize potential for loss of organic materials, wattles will be placed around the entire perimeter of the topsoil stockpile.</p> <p>Inspection #696205142 observed that the topsoil stockpiles on the Location have been left unstabilized, bare and exposed; only a single erosion log (straw wattle) had been placed on the outside perimeter of the stockpiles, and not around the entire perimeter; topsoil salvaged and placed along the access road also lacked protection and stabilization BMPs. It was also observed that BMPs and control measures to prevent weed establishment at the topsoil stockpiles were missing or insufficient; Noxious weeds (Musk thistle, houndstongue) were observed establishing on the topsoil stockpiles. Inspection required Operator to comply with Rules 606.c, 1002.b, 1002.c, 1002.f and Form 2A permit condition requirements.</p> <p>Inspection #696205253 observed that work to address the corrective action(s) has not been performed, or has been inadequate:</p> <p>-Operator has applied a hydromulch to sections of the topsoil stockpile; BMP has either not been uniformly installed per good engineering practices, or not maintained. Hydromulch was not applied, or inadequately applied, to the slopes of the stockpiles that face away from the Location; stockpiles remain unstabilized.</p> <p>-Unable to find evidence that BMPs to remove, or prevent further weed establishment have been implemented; Noxious weeds (Musk thistle, houndstongue) have continued to establish on the topsoil stockpiles; many individuals have matured, and are dispersing seed; Operator failed to take appropriate and timely actions to prevent the further spread of noxious weeds.</p> <p>On 10/23/2023, Operator submitted Resolution Nos. 403568798 and 403568818 stating corrective actions have been completed. Documentation attached show addition control measures had been implemented, which required re-working the topsoil stockpiles along the eastern and western perimeter.</p> <p>-It was observed in this inspection that weed management activities appear to have been performed, and the majority of Noxious weeds previously observed on the topsoil stockpiles have been removed. It is unclear if plants had been managed prior to maturity, and some remaining (cut) weeds with seed were observed along areas of the topsoil stockpile on the north side of the Location. Weed management at this time is considered "in-process"; additional weed management efforts will likely be necessary during the 2024 growing season to comport with 606.c and 1003.f requirements.</p> <p>-It was observed in this inspection that hydromulch had been re-applied to the topsoil stockpiles, and appears to be in proper functioning condition along the western and northern stockpile. However, hydromulch application to the topsoil stockpiles on the eastern perimeter (within areas where the sediment traps were installed) was either not applied per good engineering practices, or not maintained and is in disrepair; soils within these areas are bare and at risk to wind and water erosion; a new CA is being provided regarding the observed compliance issue.</p>		

Attached Documents

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

Document Num	Description	URL
403591302	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6317386
696205413	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6317375