

**FORM  
INSP**

Rev  
X/15

**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:

11/03/2017

Submitted Date:

11/09/2017

Document Number:

680102381

**FIELD INSPECTION FORM**

Loc ID 424970 Inspector Name: Colby, Lou 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: 10433  
Name of Operator: LARAMIE ENERGY LLC  
Address: 1401 SEVENTEENTH STREET #1400  
City: DENVER State: CO Zip: 80202

**Findings:**

- 12 Number of Comments
- 5 Number of Corrective Actions
- Corrective Action Response Requested

**Contact Information:**

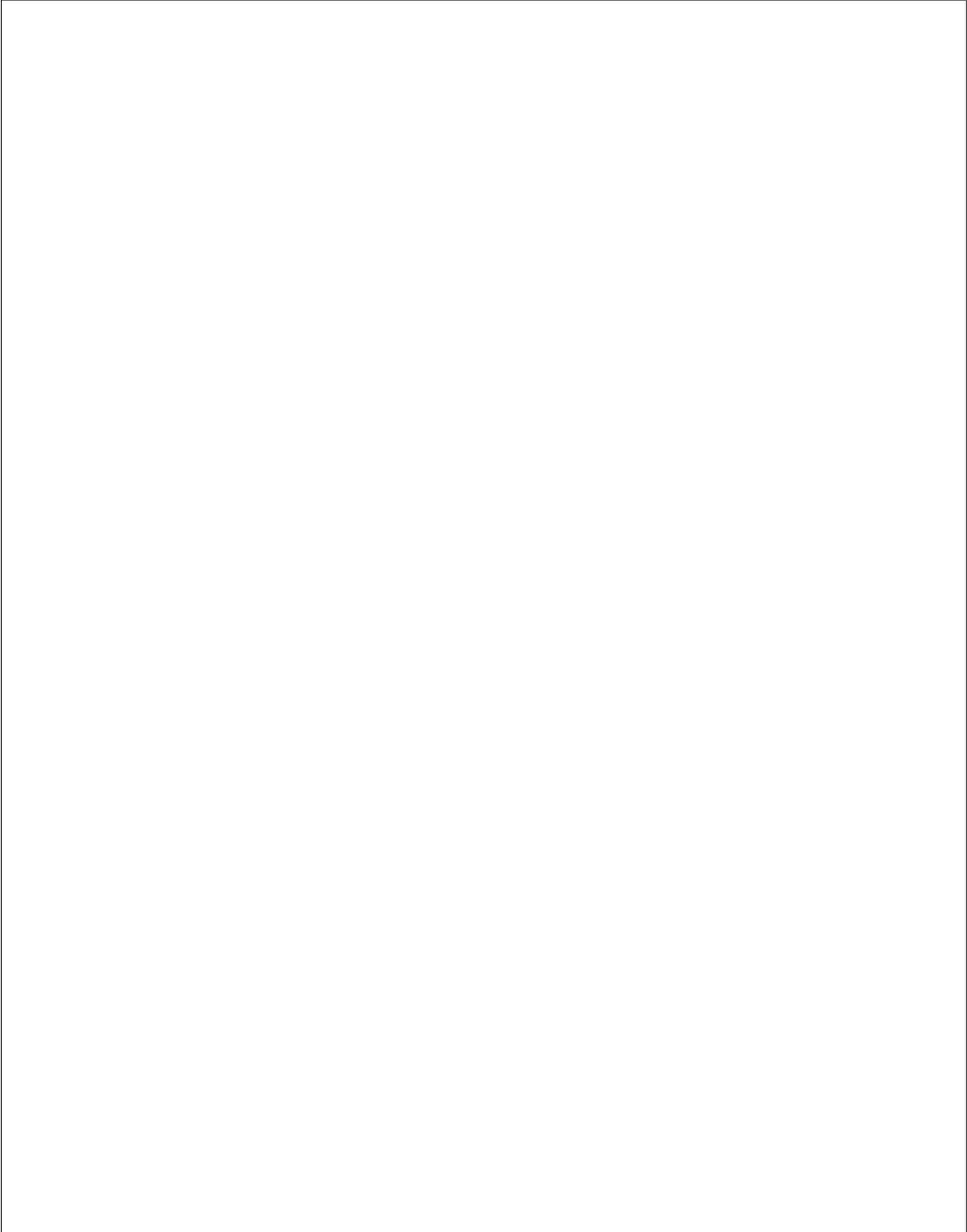
Contact Name	Phone	Email	Comment
Ash, Margaret		margaret.ash@state.co.us	
		dnr_cogccenforcement@state.co.us	
Longworth, Mike		mike.longworth@state.co.us	
		cogccnotifications@laramie-energy.com	<a href="#">All inspections</a>
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
424991	WELL	AL	10/31/2013	LO	045-20999	Cascade Creek 697-04-34A	RI
424992	WELL	AL	10/31/2013	LO	045-21000	Cascade Creek 697-05-24A	RI
424996	WELL	AL	10/31/2013	LO	045-21004	Cascade Creek 697-04-49B	RI
424998	WELL	AL	10/31/2013	LO	045-21006	Cascade Creek 697-04-26B	RI
425001	WELL	AL	10/31/2013	LO	045-21009	Cascade Creek 697-05-32B	RI
425002	WELL	AL	10/31/2013	LO	045-21010	Cascade Creek 697-04-41	RI
425003	WELL	AL	10/31/2013	LO	045-21011	Cascade Creek 697-04-51B	RI
425004	WELL	AL	10/31/2013	LO	045-21012	Cascade Creek 697-04-42	RI
425006	WELL	AL	10/31/2013	LO	045-21014	Cascade Creek 697-05-24B	RI
425007	WELL	AL	10/31/2013	LO	045-21015	Cascade Creek 697-04-51A	RI
425008	WELL	AL	10/31/2013	LO	045-21016	Cascade Creek 697-04-34B	RI
425015	WELL	AL	10/31/2013	LO	045-21019	Cascade Creek 697-04-43	RI
425020	WELL	AL	10/31/2013	LO	045-21023	Cascade Creek 697-05-32A	RI
425027	WELL	AL	10/31/2013	LO	045-21027	Cascade Creek 697-04-26A	RI
425028	WELL	AL	10/31/2013	LO	045-21028	Cascade Creek 697-04-49A	RI

**General Comment:**

This is an Interim Reclamation, Stormwater and Abandoned Location Inspection and a Follow Up to multiple CA Inspections. The Abandoned Locations (Wells) and conductor issues are addressed in the Final Reclamation Section. Additionally, there is an interim reclamation component which is addressed in that section of the inspection. It appears that CAs from Previous Inspections have not been Resolved. This Inspection is being referred to Enforcement.



**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	Storage of Supplies/Equipment is allowed at this site; however Good Housekeeping practices are not being employed. Supplies are not stored in a workman like Manner. Storage Units and Equipment stored at site had doors open and unsecured, which could entrap Wildlife.		
Corrective Action:	Organize Supplies in a Workman like Manner; label liquids & semi-solids and store in secondary containment; dispose of deteriorated supplies that have become Trash/Debris. Keep doors of Storage Units and Equipment Stored on Site closed or secured Open as dictated by use.	Date:	11/16/2017
Type	DEBRIS		
Comment:	Stored Supplies have become Debris. Most of the Debris noted in Previous Inspection has been removed; however one pile of Material that had become Debris was still noted in Current Inspection. Refer to Photos attached.		
Corrective Action:	Clean/contain/protect Supplies & Equipment; remove from Location what has become Debris. CA Date remains at CA Date from Previous Inspection	Date:	07/04/2016

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:	

**Inspected Facilities**

Facility ID: <u>424991</u>	Type: <u>WELL</u>	API Number: <u>045-20999</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>424992</u>	Type: <u>WELL</u>	API Number: <u>045-21000</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>424996</u>	Type: <u>WELL</u>	API Number: <u>045-21004</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>424998</u>	Type: <u>WELL</u>	API Number: <u>045-21006</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425001</u>	Type: <u>WELL</u>	API Number: <u>045-21009</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425002</u>	Type: <u>WELL</u>	API Number: <u>045-21010</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425003</u>	Type: <u>WELL</u>	API Number: <u>045-21011</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425004</u>	Type: <u>WELL</u>	API Number: <u>045-21012</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425006</u>	Type: <u>WELL</u>	API Number: <u>045-21014</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425007</u>	Type: <u>WELL</u>	API Number: <u>045-21015</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425008</u>	Type: <u>WELL</u>	API Number: <u>045-21016</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425015</u>	Type: <u>WELL</u>	API Number: <u>045-21019</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425020</u>	Type: <u>WELL</u>	API Number: <u>045-21023</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425027</u>	Type: <u>WELL</u>	API Number: <u>045-21027</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>425028</u>	Type: <u>WELL</u>	API Number: <u>045-21028</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Comment: [This Location is in a Sensitive Wildlife Habitat \(SWH\); Greater Sage Grouse.](#)

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment [Refer to Goodhousekeeping](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment [Site used as Storage area.](#)

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 Operator did not conducted the interim reclamation per the rules for many years. A variance for the location to become a storage yard was eventually approved on 6-23-2016. However, within the variance documents reclamation was still required and has not been conducted. A CA inspection was submitted for reclamation to be conducted by 10-17-2016 which has not occurred. As part of the approved variance there is an attached Operations Summary, which requires that reclamation still be conducted per the last paragraph of the document. Another variance per the NTO: Interim Reclamation Procedures for Delayed Operations has been submitted but has not been approved.

Corrective Action Conduct interim reclamation per the approved Variance Doc#400831952 "Operations Plan" last paragraph. CA Date remains at CA Date from previous Inspection

Date 10/17/2016

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND

Reminder: \_\_\_\_\_

Comment: This Location is in a Sensitive Wildlife Habitat (SWH); Greater Sage Grouse.

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: Refer to COGCC Comments for Final Reclamation Comments.

Corrective Action: Close & Plug Conductors per COGCC guidelines, Reclaim/ close Concrete Cellar that houses Conductors, removing concrete Debris from Location. CA Date remains at CA Date from previous Insp of 7/23/2014.

Date 07/23/2014

Overall Final Reclamation Fail 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
Seeding	Fail					

Comment: Stormwater controls are insufficient. BMPs must be implemented in accordance with good engineering practices. Steep fill slopes are unstable, loose rocky material and soil is not stabilized by any apparent BMPs. Seeding is unsuccessful and other measures are insufficient. Refer to Operations Summary, Doc#400831952 in the approved variance 6-23-2017 submitted by Operator for minimum erosion control plans .

Corrective Action: Stabilize location, fill and cut slopes, per good engineering practises. Recommend that Operator incorporate Stormwater controls with interim reclamation activities. Refer to the Operations Summary, Doc#400831952 for minimum requirements. CA Date is from Previous Inspection, 10/17/16 due to activities having not been conducted.

Date: 10/17/2016

Pits:  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
In 2013 paper work was submitted to AL the wells and permits were expired so inspections were submitted to require the conductors and cellar to be closed and reclamation to be conducted. This location is out of compliance with three CA inspections regarding closing the 15 conductors and the cellar on the location. COGCC staff started requiring the operator to close their conductors and cellar in 2013, then twice in 2014. Twenty months after the first CA inspection, a form 42 was submitted (6-23-2015) that said the CAs had been completed. However, the current inspection indicates that the conductors are still in place and were not properly closed. The fifteen AL wells on location were passed for final reclamation in a 2016 Inspection (Doc#680101278), because the conductors had been hidden with dirt so there was no evidence of "Wells". Although they were covered with dirt they were not closed properly. It appears conductors were not cut four feet below ground level and filled with inert material and the cellar removed. This inspection will Fail Final Reclamation for the fifteen wells.	colbyl	11/08/2017

**Attached Documents**

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

Document Num	Description	URL
401454432	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4298347">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4298347</a>
680102385	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4298344">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4298344</a>