

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401464742
Date Received:
11/20/2017

FIR RESOLUTION FORM

CA Summary:
2 of 3 CAs from the FIR responded to on this Form
2 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10433
Name of Operator: LARAMIE ENERGY LLC
Address: 1401 SEVENTEENTH STREET #1400
City: DENVER State: CO Zip: 80202
Contact Name and Telephone:
Name:
Phone: () Fax: ()
Email:

Additional Operator Contact:

Contact Name	Phone	Email
Wayne P Bankert	970-812-5310	wbankert@laramie-energy.com
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Arthur, Denise		denise.arthur@state.co.us

COGCC INSPECTION SUMMARY:

FIR Document Number: 680102392
Inspection Date: 11/03/2017 FIR Submit Date: 11/17/2017 FIR Status:

Inspected Operator Information:

Company Name: LARAMIE ENERGY LLC Company Number: 10433
Address: 1401 SEVENTEENTH STREET #1400
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 335902

Location Name: CASCADE CREEK-66S97W Number: 4LOT 12 County:
Qtrqtr: Lot 12 Sec: 4 Twp: 6S Range: 97W Meridian: 6
Latitude: 39.557240 Longitude: -108.218680

FACILITY - API Number: 05-045-00 Facility ID: 335902

Facility Name: CASCADE CREEK-66S97W Number: 4LOT 12
Qtrqtr: Lot 12 Sec: 4 Twp: 6S Range: 97W Meridian: 6

CORRECTIVE ACTIONS:**2** CA# 111028

Corrective Action: Wildlife has had access to Pit and it appears hoses with metal fittings are being used to discharge water into/out of Pit. Liner may be compromised. Operator needs to Contact West Environmental Supervisor, Alex Fischer & EPS, Stan Spencer to discuss Liner integrity/specs

Date: 12/01/2017Response: CA COMPLETEDDate of Completion: 11/20/2017Operator
Comment:

Corrective Action is Complete. See attached photos.

This location was being used to store fresh water and is being reclaimed/decommissioned. Regular Pond 3 fluid sampling analysis (please see attached) demonstrates Non Detect (ND) for BTEX and other Table 910-1 criteria. After the inspection conducted 11/16/2016, COGCC Inspector Colby was made aware that contact had been established with EPS Stan Spencer regarding this location (as per the CA). Please see the attached email correspondence (dated 12/15/2016) that included Inspector Colby (via CC) which details the use of this Pond, the fact that it is being used to store fresh water and that regular analytical sampling is being conducted. As already noted, Laramie staff has already been in communication with Stan Spencer and Alex Fischer (via Mr Spencer) regarding the status of this location.

Additionally, and perhaps more importantly, this location is in the process of being decommissioned. Pumps and waterlines that are on location have been use draw all the fresh water from the Pond and to prepare for removal/disposal of the liner. Recent precipitation events have resulted in the accumulation of a few inches of water in the bottom of the Pond, this will be pumped out ASAP as part of the liner removal process. Portions of the fence have been knocked down in order to facilitate water and liner removal. We have recently collected samples of the precipitate/sediment at the bottom of the pond for final disposition of the liner at a licensed facility. Laramie had intended to finalize closure of this facility in the coming weeks. Laramie will remove the pumps, hoses and return the boundary fence to its previous condition prior to removal of the liner and backfill.

Regarding the 2013 Inspection Doc #663902099, all CAs were resolved (including repair of the fence) and a Form 42 was submitted 10/31/13 (Doc #400505406). The COGCC's assertion in the General Comments section of the most recent Inspection Doc 680102392 that "CA to repair fence had not been performed...", cannot be confirmed since no COGCC inspections were conducted for more than three (3) years from 8/30/2013 until 11/14/2016. This property is owned by Laramie and enjoys the benefits of cattle grazing leases. Because cattle have been known to press the perimeter of this location, Laramie staff monitors the fence condition and repairs it as necessary in order to prevent cattle from compromising the liner. The fence has been repeatedly damaged and repaired since the last inspection in 2016.

COGCC Decision: Approved pending re-inspectionCOGCC
Representative:**3** CA# 111029

Corrective Action: Repair & Maintain Fence. CA Date is left at CA Date from previous Inspection 12/23/16. Operator needs to contact West Environmental Supervisor, Alex Fischer & EPS, Stan Spencer to discuss bringing Pit into Compliance with 902 Rules; including Fencing required per Rule 902 d. by 12/1/17.

Date: 12/23/2016Response: CA COMPLETEDDate of Completion: 11/20/2017Operator
Comment:

Corrective Action Is Complete. See attached photos.

This location is in the process of being reclaimed/decommissioned. Pumps and waterlines that are on location have been use draw all the fresh water from the Pond and to prepare for removal/disposal of the liner. Recent precipitation events have resulted in the accumulation of a few inches of water in the bottom of the Pond, this will be pumped out ASAP as part of the liner removal process. Portions of the fence have been knocked down in order to facilitate water and liner removal. We have recently collected samples of the precipitate/sediment at the bottom of the pond for final disposition of the liner at a licensed facility. Laramie had intended to finalize closure of this facility in the coming weeks. Laramie will remove the pumps, hoses and return the boundary fence to its previous condition prior to removal of the liner and backfill.

This location was being used to store fresh water and is being decommissioned. Regular Pond 3 fluid sampling analysis (please see attached) demonstrates Non Detect (ND) for BTEX and other Table 910-1 criteria. After the inspection conducted 11/16/2016, COGCC Inspector Colby was made aware that contact had been established with EPS Stan Spencer regarding this location (as per the CA). Please see the attached email correspondence (dated 12/15/2016) that included Inspector Colby (via CC) which details the use of this Pond, the fact that it is being used to store fresh water and that regular analytical sampling is being conducted. As already noted, Laramie staff has already been in communication with Stan Spencer and Alex Fischer (via Mr Spencer) regarding the status of this location.

COGCC Decision: Approved pending re-inspection

COGCC
Representative:

OPERATOR COMMENT AND SUBMITTAL

Comment: Corrective Actions 2 and 3 completed Nov 20, 2017.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Lorne C Prescott

Signed: _____

Title: Reg & Enviro Compliance

Date: 11/20/2017 3:17:16 PM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
401464742	FIR RESOLUTION SUBMITTED
401464976	2017 Fence fix

Total Attach: 2 Files