

**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:

10/18/2018

Submitted Date:

10/22/2018

Document Number:

681701107**FIELD INSPECTION FORM**

Loc ID 452797	Inspector Name: Arauza, Steven	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <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  <b>Findings:</b> 5 Number of Comments 3 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
<b>Operator Information:</b> OGCC Operator Number: <u>10433</u> Name of Operator: <u>LARAMIE ENERGY LLC</u> Address: <u>1401 SEVENTEENTH STREET #1400</u> City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>				<b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

**Contact Information:**

Contact Name	Phone	Email	Comment
Spencer, Stan		stan.spencer@state.co.us	
Prescott, Lorne	(970) 812-5311	lprescott@laramie-energy.com	
Colby, Lou		lou.colby@state.co.us	
Bankert, Wayne		wbankert@laramie-energy.com	
Fischer, Alex		alex.fischer@state.co.us	
, Laramie		cogccnotifications@laramie-energy.com	All Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
452788	WELL	DG	10/01/2018		077-10508	BCU 0993-21-05E	EI
452789	WELL	XX	10/29/2017		077-10509	BCU 0993-21-01E	EI
452790	WELL	DG	10/22/2018		077-10510	BCU 0993-21-02E	EI
452791	WELL	DG	10/09/2018		077-10511	BCU 0993-21-04W	EI
452792	WELL	DG	09/28/2018		077-10512	BCU 0993-21-05W	EI
452793	WELL	DG	08/31/2018		077-10513	BCU 0993-21-09E	EI
452794	WELL	DG	09/16/2018		077-10514	BCU 0993-21-07E	EI
452795	WELL	XX	10/29/2017		077-10515	BCU 0993-21-01W	EI
452796	WELL	DG	09/03/2018		077-10516	BCU 0993-21-08E	EI
452798	WELL	DG	10/13/2018		077-10517	BCU 0993-21-03W	EI
452799	WELL	DG	10/04/2018		077-10518	BCU 0993-21-04E	EI
452800	WELL	DG	09/19/2018		077-10519	BCU 0993-21-06E	EI
452801	WELL	DG	08/28/2018		077-10520	BCU 0993-21-09W	EI
452802	WELL	DG	08/24/2018		077-10521	BCU 0993-21-10W	EI
452803	WELL	DG	08/20/2018		077-10522	BCU 0993-21-10E	EI

452804	WELL	DG	10/17/2018		077-10523	BCU 0993-21-02W	EI
452805	WELL	DG	09/23/2018		077-10524	BCU 0993-21-06W	EI
452821	WELL	DG	09/07/2018		077-10525	BCU 0993-21-08W	EI
452831	WELL	DG	09/12/2018		077-10526	BCU 0993-21-07W	EI

**General Comment:**

COGCC Environmental Inspection conducted in response to Interim Reclamation & Stormwater field inspection report (doc #692400233). Any corrective action(s) that have not been addressed are still applicable.

Recent precipitation events have caused failure of pad containment berm and severe erosion of fill slope on north side of pad. This environmental inspection is focused on cuttings stockpile along east side of pad, which lacked adequate secondary containment to prevent commingling of stormwater runoff on inspection date. Cuttings compliance with Table 910-1 concentrations has not been demonstrated by the operator, therefore cuttings are considered E&P waste for purposes of this report.

Operator discussed cuttings management with COGCC EPS S. Arauza via phone on 10/22/2018, per corrective action included in Stormwater field inspection report. See Waste Management and Spill/Remediation sections of this report for additional corrective actions regarding cuttings management on pad.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	Chemical and equipment storage issues from previous FIR remained unaddressed as of October 18, 2018. See photos.		
Corrective Action:	Refer to field inspection report doc #692400233 (Storm Water section) for corrective actions.	Date:	10/24/2018

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>452788</u>	Type: <u>WELL</u>	API Number: <u>077-10508</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452789</u>	Type: <u>WELL</u>	API Number: <u>077-10509</u>	Status: <u>XX</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452790</u>	Type: <u>WELL</u>	API Number: <u>077-10510</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452791</u>	Type: <u>WELL</u>	API Number: <u>077-10511</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452792</u>	Type: <u>WELL</u>	API Number: <u>077-10512</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452793</u>	Type: <u>WELL</u>	API Number: <u>077-10513</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452794</u>	Type: <u>WELL</u>	API Number: <u>077-10514</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452795</u>	Type: <u>WELL</u>	API Number: <u>077-10515</u>	Status: <u>XX</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452796</u>	Type: <u>WELL</u>	API Number: <u>077-10516</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452798</u>	Type: <u>WELL</u>	API Number: <u>077-10517</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452799</u>	Type: <u>WELL</u>	API Number: <u>077-10518</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452800</u>	Type: <u>WELL</u>	API Number: <u>077-10519</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452801</u>	Type: <u>WELL</u>	API Number: <u>077-10520</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452802</u>	Type: <u>WELL</u>	API Number: <u>077-10521</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452803</u>	Type: <u>WELL</u>	API Number: <u>077-10522</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452804</u>	Type: <u>WELL</u>	API Number: <u>077-10523</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452805</u>	Type: <u>WELL</u>	API Number: <u>077-10524</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452821</u>	Type: <u>WELL</u>	API Number: <u>077-10525</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>
Facility ID: <u>452831</u>	Type: <u>WELL</u>	API Number: <u>077-10526</u>	Status: <u>DG</u>	Insp. Status: <u>EI</u>

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Drill Cuttings	Piles	Inadequate		
Comment	Unknown volume of drill cuttings spread atop cut slope on east side of pad. Cuttings stockpile lacks secondary containment berm and stormwater BMPs to prevent migration of sediment and stormwater runoff. Operator does not have waste management plan or cuttings analytical results on file with COGCC for the subject location. See FIR #692400233 for stormwater BMP corrective actions applicable to cuttings stockpile.			
Corrective Action	Immediately implement temporary solutions to control stormwater, per previous Field Inspection Report. Operator shall submit a Rule 907.a.(3) E&P Waste Management Plan for COGCC approval, via eForm 4 Sundry Notice, that describes cuttings generation, volume, management, sampling for 910-1 compliance, management for non-compliant cuttings, and final disposition. This waste management plan shall include all analytical results collected to date from cuttings stored on pad and a site diagram depicting cuttings locations.			Date: 11/06/2018

**Spill/Remediation:**

Comment:	Cuttings stockpiled on location lack adequate secondary containment berms and stormwater BMPs to prevent migration and commingling of material with precipitation on pad. Stormwater runoff and sediment transport from cuttings pile due to recent precipitation thereby threaten environmental impacts on- and off-site. See field photos.			
Corrective Action:	Submit an eForm 19 Spill/Release Report to document stormwater runoff from cuttings pile due to recent precipitation. Investigate, clean up, and document impacts, per Rule 906.			Date: 10/25/2018

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_

Wildlife Protection Devices (fired vessels): \_\_\_\_\_

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

Document Num	Description	URL
681701109	20181018 Field Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617268">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617268</a>