

**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:

11/12/2019

Submitted Date:

11/18/2019

Document Number:

698100091**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Arauza, Steven 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10433Name of Operator: LARAMIE ENERGY LLCAddress: 1401 SEVENTEENTH STREET #1401City: DENVER State: CO Zip: 80202**Status Summary:**

- ☒
- THIS IS A FOLLOW UP INSPECTION
-
- ☒
- FOLLOW UP INSPECTION REQUIRED
-
- ☐
- NO FOLLOW UP INSPECTION REQUIRED

Findings:18 Number of Comments13 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
Heil, John		john.heil@state.co.us	
Bankert, Wayne		wbankert@laramie-energy.com	
Chris, Clark		cclark@Laramie-Energy.com	
Byers, Jim		jbyers@blm.gov	All Fed inspections
, Laramie		cogccnotifications@laramie-energy.com	All Inspections
Fischer, Alex		alex.fischer@state.co.us	
Prescott, Lorne	(970) 812-5311	lprescott@laramie-energy.com	
Lutz, Deborah		debbie.lutz@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
469032	SPILL OR RELEASE	AC	11/05/2019		-	Alkali Creek Compression Station	EI

General Comment:

COGCC Environmental inspection of tank batteries on location conducted by EPS staff S. Arauza and J. Heil. Follow-up to Operator's Initial Spill/Release Report (doc #402229743, Spill/Release ID #469032). Weather conditions during inspection were sunny with a temperature of 45 degrees Fahrenheit.

Operator's Initial Spill/Release Report documented a spill of approximately 114 bbls of produced water inside of secondary containment of the north tank battery, with approximately 130 bbls of released fluids mixed with snowmelt removed. Report indicates that "a small area outside the containment exhibited staining/fluid, likely seeping from a compromise in the liner." Prior to inspection date, the liner at the subject tank battery was partially removed to facilitate subsurface investigation.

On inspection date, a depression was observed outside of containment on the east side, resulting in a gap between the ground surface and the metal containment ring. Hydrocarbon-stained material (and odors) were observed throughout lined portion of the north tank battery. See Environmental section for corrective actions.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	TRASH		
Comment:	Assorted trash (overturned bucket, pieces of insulation, wood debris) located throughout north tank battery area. See photos.		
Corrective Action:	Comply with Rule 603.f.		Date: 11/25/2019
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (pipe manifold) located SE of north tank battery. Additional unused equipment (pipe, fittings, hoses) stored throughout north tank battery area. See photos.		
Corrective Action:	Comply with Rule 603.f.		Date: 12/18/2019
Type	UNUSED EQUIPMENT		
Comment:	Two (2) unused 400 bbl ASTs stored north of compressor station. On inspection date, both tanks were missing access panels. See photos.		
Corrective Action:	Install access panel or cover exposed tank to prevent wildlife access. Comply with Rule 603.f for removal of unused equipment.		Date: 11/25/2019

Overall Good: ☐

Spills:				
Type	Area	Volume		
PW/CN	Tank	<= 1 bbl		
Comment:	Hydrocarbon-stained gravel located throughout central tank battery lined containment area. Hydrocarbon odors were observed in areas near tanks. An area of saturated soil was observed immediately outside of containment area (to the west) on inspection date. Evidence of livestock observed inside of central tank battery. See photos.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a. Submit an Initial eForm 27 Site Investigation and Remediation Workplan to conduct a thorough investigation of the subsurface beneath central tank battery for historical impacts.			Date: 12/31/2019
Other	Tank	<= 1 bbl		
Comment:	Localized accumulations of oil-stained soil located along access road east of north tank battery. See photos.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a.			Date: 12/18/2019
PW/CN	Tank	>= 5 bbls		
Comment:	Hydrocarbon-stained gravel located throughout north tank battery lined containment area, particularly beneath tank heaters. See photos. Hydrocarbon odors were observed in areas near tanks.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a. Remove and properly dispose of oily waste, per Rule 907.e.			Date: 12/18/2019

In Containment: Yes ☐Comment: ☒ Multiple Spills and Releases?

Equipment:			corrective date
Type: Compressor	# 1		
Comment:	The operator is not in compliance with Rule 313.B. Within 48-hours of receiving this Field Inspection Report, contact Debbie Lutz (303-894-2100 X 5185 or debbie.lutz@state.co.us) regarding the Form 12 and compliance with Rule 313.B.		

Corrective Action:	Within 7-days of receiving this Field Inspection Report, the operator shall bring this compressor station into compliance per Rule 313.B., notifying Debbie Lutz, Alex Fischer, and Steven Arauza when the Form 12 has been submitted.	Date:	11/25/2019
Type: Ancillary equipment	# 1		
Comment:	1000 gallon methanol AST located inside of central tank battery.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	2	300 BBLS	STEEL AST		,
Comment:	Hydrocarbon-stained gravel located throughout central tank battery lined containment area. Hydrocarbon odors were observed in areas near tanks.				
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				Date: 12/03/2019

Paint

Condition	
Other (Content)	condensate and produced water
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Inadequate	Walls Insufficient		Inadequate	
Comment:	On inspection date, multiple holes were observed in tank battery liner (north side). See photos. Operator was notified of liner integrity issues via phone on 11/13/2019.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date: 12/18/2019	
Contents	#	Capacity	Type	Tank ID	SE GPS
OTHER	5	500 BBLS	STEEL AST		,
Comment:	Hydrocarbon-stained gravel located throughout north tank battery lined containment area, particularly beneath tank heaters. See photos. Hydrocarbon odors were observed in areas near tanks.				
Corrective Action:	Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.				Date: 12/03/2019

Paint

Condition	
Other (Content)	1 condensate/produced water, 4 produced water
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Tank battery liner had been partially removed prior to inspection date to facilitate subsurface site investigation. See Environmental section for additional corrective actions.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 605.a.(4).			Date: 12/18/2019

Venting:

Yes/No		
Comment:		

Corrective Action:		Date:	
Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Environmental**Spills/Releases:**

Type of Spill: PRODUCED WATER

Estimated Spill Volume: 113

Comment: Operator reported that Spill/Release ID #469032 was discovered on 11/01/2019. As of 11/15/2019, the COGCC has not received a Supplemental eForm 19, per Rule 906.b.

Corrective Action: Operator shall immediately submit Supplemental eForm 19 for Spill/Release ID #469032, per Rule 906.b.

Date: 11/11/2019

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

Spill/Remediation:

Comment: Operator had partially removed north tank battery liner for investigation of subsurface impacts related to Spill/Release ID #469032 prior to inspection date. See photos.

Corrective Action: Operator shall submit an Initial eForm 27 Site Investigation and Remediation Workplan to conduct a full investigation into the area underlying the north tank battery to be completed this calendar year.

Date: 12/01/2019

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

COGCC Comments

Comment	User	Date
This Field Inspection Report includes corrective actions requiring the Operator to submit the following eForms to address environmental issues:	arauzas	11/15/2019
1) A Supplemental eForm 19 for Spill/Release ID #469032.		
2) An Initial eForm 27 to conduct a complete investigation of subsurface impacts beneath the north tank battery, related to Spill/Release ID #469032, to be completed by 12/31/2019.		
3) Another Initial eForm 27 to conduct a complete investigation for historical subsurface impacts beneath the central tank battery.		

Attached Documents

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

Document Num	Description	URL
698100097	20191112 field photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4990661