

**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:

01/08/2020

Submitted Date:

01/09/2020

Document Number:

698100118**FIELD INSPECTION FORM**Loc ID 425510 Inspector Name: Arauza, Steven On-Site Inspection ☐ 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:**9 Number of Comments7 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                 |                 |
| Chris, Clark    |                | cclark@Laramie-Energy.com             |                 |
| Fischer, Alex   |                | alex.fischer@state.co.us              |                 |
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| , Laramie       |                | cogccnotifications@laramie-energy.com | All Inspections |
| Pesicka, Conor  |                | conor.pesicka@state.co.us             |                 |

**Inspected Facilities:**

| Facility ID | Type                          | Status | Status Date | Well Class | API Num | Facility Name                             | Insp Status |
|-------------|-------------------------------|--------|-------------|------------|---------|---|-------------|
| 441238      | CENTRALIZED EP WASTE MGMT FAC | AC     | 06/17/2015  |            | -       | HARRISON CR WTR TRMENT FAC IMPOUND 441238 | EI          |
| 466150      | SPILL OR RELEASE              | AC     |             |            | -       | HCWTF Pond 4 4                            | EI          |

**General Comment:**

COGCC Environmental Inspection conducted by EPS staff S. Arauza and J. Heil. Follow up to 4/9/2019 Field Inspection Report doc #681701205 and Remediation Project #11939. Weather conditions during inspection were sunny with approximately 1 foot of snow covering the facility. Snow coverage on west, south, and east sides of all pits prevented inspection for liner integrity issues. See photos.

Operator has installed "Fresh Water Discharge" sign at outlet from Pond 4 Dewatering system to stormwater ditch in response to 4/9/2019 FIR.

Where Corrective Actions from 4/9/2019 FIR have not been adequately addressed, Corrective Action dates are left unchanged.

| Inspected Facilities |               |       |                   |             |          |                   |                         |
|----------------------|---------------|-------|-------------------|-------------|----------|-------------------|-------------------------|
| Facility ID:         | <u>441238</u> | Type: | <u>CENTRALIZE</u> | API Number: | <u>-</u> | Status: <u>AC</u> | Insp. Status: <u>EI</u> |
|                      |               |       |                   |             |          |                   |                         |
| Facility ID:         | <u>466150</u> | Type: | <u>SPILL OR</u>   | API Number: | <u>-</u> | Status: <u>AC</u> | Insp. Status: <u>EI</u> |
|                      |               |       |                   |             |          |                   |                         |

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**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Spill/Release ID #466150 was reported to the COGCC on 7/15/2019 for a leak detected in Pond 4 on 7/4/2019. Operator has not provided any spill updates since 7/25/2019 supplemental report (doc #402122392).

Corrective Action: Immediately provide for Spill/Release Point ID #466150 via a Supplemental eForm 19. Supplemental eForm 19 shall address COAs listed on previously-approved eForm 19s (docs #402109564 and #402122392).

Date: 01/31/2020

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: Remediation Project #11939 has been assigned to document operator's delineation and remediation efforts in response to Spill ID #456666. Operator was required to submit a project update via a Supplemental eForm 27 no later than 5/22/2019 as a Corrective Action on 4/9/2019 FIR (doc #681701205). The required eForm 27 has not been received as of 1/9/2020.

Corrective Action: Operator shall immediately submit an eForm 27 update to Remediation Project #11939. Supplemental F27 Project Update shall address COAs listed on previously-approved F27s (doc #401777422 and #401833896).

Date: 05/22/2019

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

Comment: 

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

## Reclamation - Storm Water - Pit

**Storm Water:**

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
|                  |                 |                         |                       |               |                          |         |

Comment: Corrective Action: Date: **Pits:** ☐ NO SURFACE INDICATION OF PIT

Type: Produced Water      Lined: YES      Pit ID:      Lat: 39.267206      Long: -107.751023

Reference Point: SE      Other:       Length: 470      Width: 340

**Lining:**Liner Type: Liner Condition: Comment: 

Pond 2: Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.

Corrective Action: 

Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."

Date: 06/22/2019**Fencing:**Fencing Type: Fencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Netting Condition: Comment: Corrective Action: Date: Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard: Comment: Corrective Action: Date: 

Type: Water Fresh      Lined: YES      Pit ID:      Lat: 39.269975      Long: -107.751975

Reference Point: SE      Other:       Length: 680      Width: 370

**Lining:**Liner Type: HDPELiner Condition: Comment: 

Pond 4: Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.

Corrective Action: 

Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."

Date: 06/22/2019**Fencing:**Fencing Type: Fencing Condition: Comment: Corrective Action: Date: **Netting:**

|                             |                   |  |                       |                          |
|-----------------------------|-------------------|--|-----------------------|--------------------------|
| Netting Type:               |                   | Netting Condition:   |                       |                          |
| Comment:                    |                   |  |                       |                          |
| Corrective Action:          |                   |  |                       | Date:                    |
| Anchor Trench Present:      |                   | Oil Accumulation:  | 2+ feet Freeboard:    |                          |
| Comment:                    |                   | Fluids visible on pit during inspection, Spill/Release Point ID #466150 documents fluid accumulation in leak detection sump with no documentation of repairs made.   |                       |                          |
| Corrective Action:          |                   | Submit documentation of pit operations for Pond 4 via an FIRR. Operator shall include documentation of liner repair and date(s) that fluids were reintroduced to pit.  |                       |                          |
| Date:                       |                   | 02/09/2020   |                       |                          |
| Type: <u>Produced Water</u> | Lined: <u>YES</u> | Pit ID:  | Lat: <u>39.268910</u> | Long: <u>-107.751188</u> |
| Reference Point: <u>SE</u>  | Other: _____      | Length: <u>60</u>  | Width: <u>300</u>     |                          |
| <b>Lining:</b>              |                   |  |                       |                          |
| Liner Type:                 |                   | Liner Condition:   |                       |                          |
| Comment:                    |                   | Pond 3: Operator was required to submit an eForm 15 Pit Report no later than 6/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. This requirement was confirmed by COGCC Environmental Supervisor in response to an FIRR form doc #402149596.   |                       |                          |
| Corrective Action:          |                   | Per FIRR doc #402149596: "Provide As-Build for Pond 4, review and stamped by a Colorado P.E. Provide Form 15 Pit Reports for Ponds 2, 3, and 4."   |                       |                          |
| Date:                       |                   | 06/22/2019   |                       |                          |
| <b>Fencing:</b>             |                   |  |                       |                          |
| Fencing Type:               |                   | Fencing Condition:   |                       |                          |
| Comment:                    |                   |  |                       |                          |
| Corrective Action:          |                   |  |                       |                          |
| Date:                       |                   |  |                       |                          |
| <b>Netting:</b>             |                   |  |                       |                          |
| Netting Type:               |                   | Netting Condition:   |                       |                          |
| Comment:                    |                   | Operator was required to investigate pit liner bulge and to provide investigation results no later than 5/22/2019 as a Corrective Action on 4/9/2019 FIR doc #681701205. Operator indicated that this CA was completed via FIRR doc #402149596, but did not attach information specific to Pond 3. |                       |                          |
| Corrective Action:          |                   | Investigate pit liner bulge/bubble at inlet on east side of 'Pond 3,' provide investigation results via Field Inspection Resolution Form or, if a spill or release is detected, an eForm 19.   |                       |                          |
| Date:                       |                   | 05/22/2019   |                       |                          |
| Anchor Trench Present:      |                   | Oil Accumulation:  | 2+ feet Freeboard:    |                          |
| Comment:                    |                   |  |                       |                          |
| Corrective Action:          |                   |  |                       |                          |
| Date:                       |                   |  |                       |                          |

**Attached Documents**

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

| Document Num | Description           | URL   |
|--------------|-----------------------|---|
| 698100119    | 20201008 field photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5033315">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5033315</a> |