

**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:

06/24/2020

Submitted Date:

07/10/2020

Document Number:

696201457

**FIELD INSPECTION FORM**

Loc ID 312445 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**  
 THIS IS A FOLLOW UP INSPECTION  
 FOLLOW UP INSPECTION REQUIRED  
 NO FOLLOW UP INSPECTION REQUIRED

**Findings:**  
6 Number of Comments  
3 Number of Corrective Actions  
 Corrective Action Response Requested

**Operator Information:**  
 OGCC Operator Number: 10433  
 Name of Operator: LARAMIE ENERGY LLC  
 Address: 1401 SEVENTEENTH STREET #1401  
 City: DENVER State: CO Zip: 80202

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
, Laramie		cogccnotifications@laramie-energy.com	<a href="#">All Inspections</a>
,		dnr_cogccenforcement@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221628	WELL	PA	08/29/2019	GW	077-08230	HORSEHOE CANYON 5	RI
312445	LOCATION	CL			-	Horseshoe Canyon 5 Pad	RI

**General Comment:**

On 6/24/2020, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Laramie Energy LLC's Horseshoe Canyon 5 Pad Location in Mesa County, Colorado.

The following compliance issues were observed during this inspection:  
 Rule 603.f  
 1003/1004 Rules

Due to the significant nature, extent, or duration of alleged rule violations documented in this inspection, this Location is being referred to enforcement and corrective action dates may not be applied. Perform the corrective action(s) immediately to avoid further enforcement and potential penalties.

Refer to the "Location" and "Reclamation" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type STORAGE OF SUPL

Comment: Previous inspections documented unused equipment, or equipment not needed for production, being stored on both the production and (what should be) the interim areas of the Location. Inspections required Operator to comply with Rule 603.f.

It was observed in this inspection that the corrective action has not been addressed; unused equipment, or equipment not needed for production remains stored on the Location. This corrective action has not been addressed and remains applicable.

Corrective Action: **Comply with Rule 603.f**

Date: 09/21/2018

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: 221628 Type: WELL API Number: 077-08230 Status: PA Insp. Status: RI

Facility ID: 312445 Type: LOCATION API Number: - Status: CL Insp. Status: RI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

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

Land Use: \_\_\_\_\_

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

**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 \_\_\_\_\_

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

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

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? Fail Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? Fail  
 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? Fail  
 Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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 Previous inspections documented unused equipment, and/or equipment not needed for production being stored on areas subject to interim reclamation pursuant to 1003 Rules. Inspections required Operator to remove equipment and reclaim areas not needed for production.  
  
It was observed in this inspection that equipment has not been removed, and that interim reclamation was not conducted per 1003 Rules and the corrective actions.  
  
It is noted that even though the well on the Location has been plugged, and that the Location is now also subject to 1004 Final Reclamation, the corrective action (and date) requiring interim reclamation was not addressed and therefore will remain applicable until addressed in its entirety.

Corrective Action Comply with Rule 1003.b Date 10/15/2018

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

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

Final Land Use: \_\_\_\_\_

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

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

Well plugged Pass Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed Fail No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded Fail Contoured Fail Culverts removed \_\_\_\_\_

Gravel removed Fail

Location and associated production facilities reclaimed Fail Locations, facilities, roads, recontoured Fail

Compaction alleviation Fail Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% Fail 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: It was observed in this inspection that the Location remains out of compliance with COGCC rules and corrective actions; Various unused equipment and debris remains stored on the Location and interim areas; Operator failed to remove equipment in accordance with Rule 603.f, and conduct interim reclamation pursuant to 1003 requirements.

Well has been plugged and Location is subject to final reclamation requirements; The required reclamation activities do not appear to have been conducted. Operator has failed to conduct final reclamation by the first favorable and local growing season pursuant to 1004 Rules.

Corrective Action: Comply with COGCC 1004 Rules and conduct final reclamation on the Location.

Date \_\_\_\_\_

Overall Final Reclamation

Fail

Well Release on Active Location

Multi-Well Location

**COGCC Comments**

Comment	User	Date
<p><span style="color: blue;">COGCC Records show 11 corrective action inspections dating back to 8/21/2015 documenting compliance issues regarding the storage of unused equipment (or equipment not needed for production) on both the production areas and areas subject to interim reclamation requirements in violation of Rules 603.f and 1003. Inspections also documented that no variance request to waive these requirements was ever submitted or approved. Original CA date regarding removal of equipment/supplies/debris stored on the Location for previous operator was 9/30/15, and 12/20/2015 for interim reclamation.</span></p> <p><span style="color: blue;">Operator submitted Resolution Form #402033382 stating observed equipment is not owned by the Operator. The resolution form was "Not Approved" by the COGCC.</span></p> <p><span style="color: blue;">Form 6(s) #402177253 states well was plugged 8/29/2019; Location is now also subject to 1004 final reclamation requirements.</span></p> <p><span style="color: blue;">To date no 502.b variance to waive COGCC Rules and Requirements has been submitted or approved.</span></p>	trujilloam	06/25/2020

**Attached Documents**

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

Document Num	Description	URL
696201478	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194464">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5194464</a>