

**FORM  
INSP**Rev  
X/20

# 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:

11/08/2021

Submitted Date:

11/16/2021

Document Number:

693903886

**FIELD INSPECTION FORM**
 Loc ID 312051 Inspector Name: ROY, CATHERINE On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**

OGCC Operator Number: 10679

Name of Operator: LOGOS OPERATING LLC

Address: 2010 AFTON PLACE

City: FARMINGTON State: NM Zip: 87401

**Status Summary:**

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

**Findings:**

6 Number of Comments

2 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
Trujillo, Aaron		aaron.trujillo@state.co.us	
,		regulatory@logosresourcesllc.com	All Inspections 8/2/2021
Rowley, Darren		drowley@logosresourcesllc.com	All inspections
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
216532	WELL	TA	05/01/2019	GW	067-08138	BONDAD 33-9 22A	RI

**General Comment:**

On 11/8/2021 Catherine Roy conducted a followup reclamation and stormwater inspection in response to stormwater erosion and discharges into waters of the state observed in July 2021 on locations mapped within the FEMA floodplain and Aquatic Native Species Conservation Waters.

During this inspection the following compliance issues were observed:

-Operator submittal of a single map illustrating straw wattle and berm placement is considered non-responsive to corrective action to submit a stormwater plan detailed in the 7/29/2021 reclamation inspection. As described in the corrective action, the plan needs to demonstrate that stormwater flows will be properly diverted and that the location will be protected from degradation. The plan needs to describe how all inlets and outlets will be properly designed and constructed to ensure stabilization using good engineering practices. The submitted map does not meet these requirements. To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing.

As observed on 11/8/2021, some of the eroded debris is removed and cobble (~3-6inch) is placed at down-stream side of facilities. The length of the cobble placement is significantly shorter than what was shown on the operator submitted SWMP map. Bare, unstabilized, and scoured soils remain where eroded debris was deposited and has since been removed. Well pad gravel that flowed off of the southern portion of the project area is not cleaned out. The straw wattles (6inch) placed within the northern swale (not properly installed) and an approximately 10inch berm placed at well pad entrance, are not adequate BMPs and do not demonstrate good engineering practices. Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

-Corrective action from 7/29/2021 to submit a shut-in plan per rule 421.b. is not addressed. Per the rule, the operator needs to submit their shut-in plan when requested. Operator statement on inspection response document indicates that operator engaged in correspondence with COGCC permitting staff regarding the shut in plan weeks after the corrective action date expired, and did not communicate with that staff member that the information was requested by a COGCC reclamation specialist in response to a corrective action inspection. Corrective action is back-dated to original corrective action date (8/2/2021) to document duration of non-compliance for enforcement purposes.

-This is a shared location between Simcoe and Logos. It is the responsibility of both operator's who will receive this inspection, to ensure compliance with COGCC rules.

-It is apparent that eroded well pad material from July 2021 inspection was washed downstream into the Florida River (Waters of the State) as eroded material was observed downstream and in the river.

See below, and attached photos for additional detail.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:	-Shut in plan was not provided per 7/29/2021 inspection. Additionally, Operator needs to ensure that all equipment is anchored per the 421.b. floodplain rules.		
Corrective Action:	-Corrective action to submit a shut-in plan per rule 421.b. is not addressed. Per the rule, the operator needs to submit their shut-in plan when requested. The corrective action is back-dated to original corrective action date (8/2/2021) to document duration of non-compliance for enforcement purposes.		Date: <u>08/02/2021</u>

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	216532	Type:	WELL	API Number:	067-08138	Status:	TA	Insp. Status:	RI

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

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: Per communication with Jim Hughes, area environmental specialist, and onsite assessments it is apparent that E&P waste management activities in July 2021, were not in compliance with Rule 905.a.(2), and that reporting is not consistent with 912.b., as contents of the partially buried vessel threatened waters of the state during the July 2021 storm event.

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

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

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: \_\_\_\_\_

**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: Operator submittal of a single map illustrating straw wattle and berm placement is considered non-responsive to corrective action to submit a stormwater plan detailed in the 7/29/2021 reclamation inspection.

Some eroded debris is removed and cobble (~3-6inch) is placed at down-stream side of facilities. While not an appropriate BMP in this area, cobble placement is not as long as mapped on SWMP map. Bare, unstabilized, and scoured soils remain where debris was deposited and since removed. Well pad gravel that flowed off of the southern portion of the project area remains. The straw wattles (6inch) are placed within swale (not properly installed) and an approximately 10inch berm placed at well pad entrance, are not adequate BMPs.

Corrective Action: Submit and implement a stormwater control plan. As described in the 7/29/2021 corrective action, the plan needs to demonstrate that stormwater flows will be properly diverted and that the location will be protected from degradation. The plan needs to describe how all inlets and outlets will be properly designed and constructed to ensure stabilization using good engineering practices. To demonstrate that stormwater controls will be implemented per good engineering practices, the stormwater plan needs to be stamped by a Colorado Professional Engineer in good standing.

Corrective action is back-dated to initial inspection date (7/29/2021) to document duration of non-compliance for enforcement purposes.

Date: 07/29/2021

Pits: ☐ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
402872526	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582547">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582547</a>
402874474		<a href="#">Inspection Photos 067-08731 2.pdf</a>
402874480	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5584168">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5584168</a>
402874486	Inspection Photos 11-8-2021 2	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5584180">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5584180</a>
693903887	Inspection Photos 11-8-2021	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582543">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582543</a>
693903888	Inspection Photos 7-29-2021	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582544">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5582544</a>