

**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:

08/30/2022

Submitted Date:

09/12/2022

Document Number:

690203372

FIELD INSPECTION FORM

Loc ID 325172 Inspector Name: COSTA, RYAN On-Site Inspection 2A Doc Num: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10679
Name of Operator: LOGOS OPERATING LLC
Address: 2010 AFTON PLACE
City: FARMINGTON State: NM Zip: 87401

Findings:

- 7 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
COGCC		dnr_cogccenforcement@state.co.us	
Logos		regulatory@logosresourcesllc.com	
Rowley, Darren		drowley@logosresourcesllc.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
214194	WELL	PR	01/01/2022	GW	067-05515	BONDAD 33-9 5	RI

General Comment:

This is a follow up of the previous reclamation inspection #693903863 and in regard to NOAV #403104417. See attached photos and additional details within this report.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:

Type:	#		corrective date
Comment:	Open cellar still observed at the wellhead. Previous corrective action was not completed.		
Corrective Action:	Per Rule 406.e., Operator needs to install wildlife/livestock protection around the wellhead cellar to prevent accidental access, by 11/30/2021.		Date: <u>11/30/2021</u>
Type:	#		
Comment:	Previous corrective action required submittal of Flood Shut In plan by 8/2/2021. NOAV #403104417 required submittal of plan on date of issuance, 7/13/2022. Operator did not submit the Flood Shut In plan until 8/16/2022.		
Corrective Action:			Date:

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

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 submitted the stormwater management plan on 8/4/2022, which was required per the NOAV #403104417 by 7/13/2022. Previous corrective action inspections required a plan to be submitted by 7/29/2021. It does not appear that any further stormwater management was performed since the previous inspection. Operator's response to NOAV indicates implementation will be performed once plan is approved.

Corrective Action: COGCC accepts the submission of the stormwater plan however no approval will be provided since it is the Operator's responsibility to remain in compliance at all times regardless of a submitted plan. Stormwater management must be designed, implemented, and maintained according to good engineering practices which may require further actions beyond the scope of the plan.
Install or repair required BMPs per Rule 1002.f.(2)C

Date: _____

Pits: NO SURFACE INDICATION OF PIT

Type:	Lined:	Pit ID:	Lat:	Long:
Reference Point: _____	Other: _____	Length: _____	Width: _____	

Lining:

Liner Type: _____ Liner Condition: _____

Comment: COGCC considers open-top partially buried vessels (PBV) such as the PBV within the project area, as a pit. As such, these need to be constructed, maintained, and operated according to Rule 909. Specifically, the onsite PBV needs to be maintain with 2ft of freeboard per Rule 909.c

Corrective Action _____

Date: _____

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: _____

COGCC Comments

Comment	User	Date
<p>1. The stormwater management plan does not indicate what storm event the plan is designed to accommodate.</p> <p>2. The plan does not appear to address protection of all equipment in a high water situation which triggered the NOAV in first place, and should be part of the scope of planning for the location.</p> <p>3. Possible sediment moving off site has not been addressed. For instance no sediment controls such as a sediment trap and/or inlet outlet protection are part of the plan. The stormwater management plan may or may not be adequate for compliance of 900 series Rules during a high water situation to protect waters of the State.</p>	CostaR	09/12/2022
<p>The open top tank has a steel grate which will not prevent spillage from occurring. Additionally the access door hatch should be kept secured due to instances where wildlife such as a bear can enter into tank. There has been known cases of wildlife mortality due to unsecured entry.</p>	CostaR	09/12/2022

Attached Documents

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

Document Num	Description	URL
403165559	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5859782
690203393	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5859767