

**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:

07/14/2023

Submitted Date:

07/17/2023

Document Number:

696205100

FIELD INSPECTION FORM

Loc ID 335647	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 15 Number of Comments 6 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: 10433 Name of Operator: LARAMIE ENERGY LLC Address: 1700 LINCOLN ST STE 3950 City: DENVER State: CO Zip: 80203				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Arthur, Denise		denise.arthur@state.co.us	
, Laramie		cogccnotifications@laramie-energy.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335647	LOCATION	AC			-	Cascade Creek (CC) 0603-23-32	CI
457330	WELL	AP	05/12/2022	LO	045-24064	CC 0697-03-23E	ND
457331	WELL	AP	05/12/2022	LO	045-24065	CC 0697-03-25W	ND
457333	WELL	AP	05/12/2022	LO	045-24067	CC 0697-03-27W	ND
457334	WELL	AP	05/12/2022	LO	045-24068	CC 0697-03-19E	ND
457335	WELL	AP	05/12/2022	LO	045-24069	CC 0697-03-22E	ND
457338	WELL	AP	05/12/2022	LO	045-24072	CC 0697-03-21W	ND
457339	WELL	AP	05/12/2022	LO	045-24073	CC 0697-03-26W	ND
457341	WELL	AP	05/12/2022	LO	045-24075	CC 0697-03-24E	ND
457343	WELL	AP	05/12/2022	LO	045-24077	CC 0697-03-21E	ND
457344	WELL	AP	05/12/2022	LO	045-24078	CC 0697-03-25E	ND
457345	WELL	AP	05/12/2022	LO	045-24079	CC 0697-03-20W	ND
457346	WELL	AP	05/12/2022	LO	045-24080	CC 0697-03-20E	ND
457347	WELL	AP	05/12/2022	LO	045-24081	CC 0697-03-23W	ND
457348	WELL	AP	05/12/2022	LO	045-24082	CC 0697-03-26E	ND
457349	WELL	AP	05/12/2022	LO	045-24083	CC 0697-03-22W	ND
457350	WELL	AP	05/12/2022	LO	045-24084	CC 0697-03-27E	ND
482154	WELL	AP	05/12/2022	LO	045-24510	CC 0697-04-12E	ND
482155	WELL	AP	05/12/2022	LO	045-24511	CC 0697-04-14E	ND
482156	WELL	AP	05/12/2022	LO	045-24512	CC 0697-04-11E	ND

482157	WELL	AP	05/12/2022	LO	045-24513	CC 0697-04-13E	ND
482158	WELL	AP	05/12/2022	LO	045-24514	CC 0697-04-22E	ND
482159	WELL	AP	05/12/2022	LO	045-24515	CC 0697-04-23E	ND
482160	WELL	AP	05/12/2022	LO	045-24516	CC 0697-04-16E	ND
482161	WELL	AP	05/12/2022	LO	045-24517	CC 0697-04-15E	ND

General Comment:

On 7/14/2023, Reclamation Specialist Trujillo conducted a construction and stormwater inspection at Laramie Energy LLC's Cascade Creek (CC) 0603-23-32 location in Garfield County, Colorado.

This inspection is a follow-up to #696204265 and #696204558 to document compliance with the following corrective actions:

- Stormwater
- Protection of Soils

It was observed in this inspection that the Location remains out of compliance with CECMC Rules and Corrective actions.

The following new compliance issues were observed during this inspection:

- Labels
- Stained soils
- Soil Segregation

Refer to the "Construction" 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 inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Location entrance w/ Permit information		
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:	The majority of the 400 bbl tanks stored on the north end of the pad lack required labeling; labels either missing, or with incorrect Operator information.		
Corrective Action:	Comply with Rule 605.h. The "Date of Discovery" is being provided as the corrective action date. Location will remain out of compliance until corrective action is resolved.	Date:	07/14/2023

Emergency Contact Number:

Comment:		
Corrective Action:		Date: _____

Overall Good: ☐

Spills:			
Type	Area	Volume	
	Tank		
Comment:	Stained soils observed at base of tanks stored on the north end of the Location.		
Corrective Action:	Clean/remediation soils to Table 915-1 standards. Comply with Rule 1002.f and install/mainain spill prevention/containment BMPs at tanks. The "Date of Discovery" is being provided as the corrective action date. Location will remain out of compliance until corrective action has been resolved.	Date:	07/14/2023

In Containment: No

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

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 335647 CDP: _____

Comment: Previous inspection observed that the Locations disturbance area (7.1 acres) exceeded the Form 2A #402609514 permitted disturbance area of 6.7 acres.

Corrective Action: Date: _____**Form 2A COAs:**Comment: Corrective Action: Date: _____

Wildlife BMPs:**Comment:** Corrective Action: **Date:** **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
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	No		
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Comments: Erosion BMPs: **Per SWMP #402877702, a culvert is planned at the access road; culvert not observed.**Other BMPs: Corrective Action: Date: Comments: Erosion BMPs: **See "COMMENT #1" and the end of this report.**Other BMPs: Corrective Action: **Comply with 1002.f**

Date: 10/17/2022

	No		
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Comments: Erosion BMPs: **Per SWMP #402877702, Operator stated a two sediment traps connected with a drain pipe would be constructed on the south end of the Location; Sediment traps were not observed and do not appear to have been constructed per the Form 2A SWMP.**Other BMPs: Corrective Action: Date:

SILT FENCES	Yes		
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Comments: Erosion BMPs: **Per SWMP #402877702, a Ditch/Berm is planned to be constructed w/ excess material between the topsoil stockpiles and the fill slopes. It was observed in this inspection that Operator has installed silt fences rather than a ditch/berm. Operator has failed to maintain BMPs in a proper functioning condition; silt fence were observed to be in disrepair throughout Location, and is inadequate to ensure topsoil remains segregated from fill material (see "protection of soils").**Other BMPs: Corrective Action: **Comply with Rule 1002.f. Inspection #696204558 dated 12/27/2022 provided comment to the Operator that the silt fence was in disrepair; Operator failed to ensure BMP was repaired and/or maintained in proper functioning condition, therefore a CA date of 12/27/2022 is being provided,**

Date: 12/27/2022

Comment: **Perimeter stormwater controls largely inadequate to manage runoff in a manner that minimizes erosion, degradation and offsite sediment transport from the 7.1 acre disturbance area.****Corrective Action:** **Date:** **On Site Inspection (305):****Surface Owner Contact Information:**Name: Address: Phone Number: Cell Phone: **Operator Rep. Contact Information:**Landman Name: Phone Number: Date Onsite Request Received: Date of Rule 306 Consultation: Request LGD Attendance:

<u>LGD Contact Information:</u>		
Name: _____	Phone Number: _____	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>		
<div></div>		
<u>Summary of Operator Response to Landowner Issues:</u>		
<div></div>		
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>		
<div></div>		

Inspected Facilities				
Facility ID: <u>335647</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>CI</u>
Facility ID: <u>457330</u>	Type: <u>WELL</u>	API Number: <u>045-24064</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457331</u>	Type: <u>WELL</u>	API Number: <u>045-24065</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457333</u>	Type: <u>WELL</u>	API Number: <u>045-24067</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457334</u>	Type: <u>WELL</u>	API Number: <u>045-24068</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457335</u>	Type: <u>WELL</u>	API Number: <u>045-24069</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457338</u>	Type: <u>WELL</u>	API Number: <u>045-24072</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457339</u>	Type: <u>WELL</u>	API Number: <u>045-24073</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457341</u>	Type: <u>WELL</u>	API Number: <u>045-24075</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457343</u>	Type: <u>WELL</u>	API Number: <u>045-24077</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457344</u>	Type: <u>WELL</u>	API Number: <u>045-24078</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457345</u>	Type: <u>WELL</u>	API Number: <u>045-24079</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457346</u>	Type: <u>WELL</u>	API Number: <u>045-24080</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457347</u>	Type: <u>WELL</u>	API Number: <u>045-24081</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457348</u>	Type: <u>WELL</u>	API Number: <u>045-24082</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457349</u>	Type: <u>WELL</u>	API Number: <u>045-24083</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>457350</u>	Type: <u>WELL</u>	API Number: <u>045-24084</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>482154</u>	Type: <u>WELL</u>	API Number: <u>045-24510</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>
Facility ID: <u>482155</u>	Type: <u>WELL</u>	API Number: <u>045-24511</u>	Status: <u>AP</u>	Insp. Status: <u>ND</u>

Inspector Name: Trujillo, Aaron

Facility ID:	482156	Type:	WELL	API Number:	045-24512	Status:	AP	Insp. Status:	ND
Facility ID:	482157	Type:	WELL	API Number:	045-24513	Status:	AP	Insp. Status:	ND
Facility ID:	482158	Type:	WELL	API Number:	045-24514	Status:	AP	Insp. Status:	ND
Facility ID:	482159	Type:	WELL	API Number:	045-24515	Status:	AP	Insp. Status:	ND
Facility ID:	482160	Type:	WELL	API Number:	045-24516	Status:	AP	Insp. Status:	ND
Facility ID:	482161	Type:	WELL	API Number:	045-24517	Status:	AP	Insp. Status:	ND

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____ Fail _____

Comment _____

[See "Comment #2" at the end of this report.](#)

Corrective Action _____

Comply with Rule 1002.b.(2). Coordinate with NW Reclamation Specialist so CECMC Staff are on site during segregation activities; topsoil will be required to be imported to supplement the topsoil resource lost.

Date **07/14/2023**

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

[See "Comment #2" at the end of this report.](#)

Corrective Action _____

Comply with 1002.f and 1002.c

Date **10/17/2022**

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? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

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? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

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 _____

Corrective Action _____ Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads _____ Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

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

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ 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: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____ Well Release on Active Location ☐ Multi-Well Location ☐

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>Inspection #696204265 observed that Operator implemented a single row of erosion logs along the northern/eastern perimeter in such a manner that BMP is inadequate to manage runoff, minimize erosion and sediment transport from the Location; BMP exceeds 100 feet from the Location's disturbance along areas of the perimeter.</p> <p>It was observed in this inspection that erosion logs have been installed along the eastern perimeter of the Location, at the edge of the disturbance/topsoil stockpiles. However, controls along the northern perimeter of the disturbance, and soil stockpiles remain missing or insufficient. This CA has not been addressed and remains applicable.</p>	trujilloam	07/17/2023
<p>COMMENT #2</p> <p>Inspection Nos. 696204265 and #696204558 observed that BMPs to protect topsoil from wind and water erosion, as well as to minimize sediment transport, and to ensure soils remain properly segregated from the fill slopes and subsoils are missing or insufficient; topsoil stockpiles bare and at risk to wind and water erosion/degradation. Inspection required Operator to comply with 1002.f and 1002.c.</p> <p>It was observed in this inspection that Operator has implemented erosion logs, or silt fences along base of the topsoil stockpiles; BMPs observed to not be in proper functioning condition. It was also observed that BMPs to stabilize, as well as to protect the topsoil from wind and water erosion, and weed establishment remain missing or insufficient per the corrective actions; topsoil stockpiles remain largely bare; vegetation observed establishing are Undesirable Plant Species such as Amaranth, various introduced mustard species, prostrate knotweed, etc...</p> <p>The large subsoil stockpile located on the eastern corner of the Location also lacks stabilization and adequate controls to minimize erosion and degradation; potential safety issues also exist due to the unstabilized steep slopes above the pad.</p> <p>It was also observed that Operator has failed to ensure topsoils remain properly separated from subsoils; BMPs between the topsoil and fill slopes inadequate; subsoils also observed pushed onto sections of the topsoil stockpiles.</p> <p>Location remains out of compliance with 1002 rules, including soil protection and segregation requirements. Previous corrective actions remain applicable.</p>	trujilloam	07/17/2023

Attached Documents

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

Document Num	Description	URL
696205101	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6184238