

**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:

08/02/2023

Submitted Date:

08/07/2023

Document Number:

696205142

FIELD INSPECTION FORM

Loc ID 481743	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input 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: 19 Number of Comments 9 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
481743	LOCATION	AC			-	Cascade Creek (CC) 0697-15-08	CI
482542	WELL	AP	07/14/2022	LO	045-24518	CC Federal 0697-15-17W	CI
482543	WELL	AP	07/14/2022	LO	045-24519	CC Federal 0697-15-19W	CI
482544	WELL	AP	07/14/2022	LO	045-24520	CC 0697-10-15E	CI
482545	WELL	AP	07/14/2022	LO	045-24521	CC 0697-15-19E	CI
482546	WELL	AP	07/14/2022	LO	045-24522	CC 0697-15-12E	CI
482547	WELL	AP	07/14/2022	LO	045-24523	CC 0697-15-13E	CI
482548	WELL	AP	07/14/2022	LO	045-24524	CC 0697-10-16E	CI
482549	WELL	AP	07/14/2022	LO	045-24525	CC 0697-15-02E	CI
482550	WELL	AP	07/14/2022	LO	045-24526	CC 0697-15-15E	CI
482551	WELL	AP	07/14/2022	LO	045-24527	CC 0697-15-14E	CI
482552	WELL	AP	07/14/2022	LO	045-24528	CC 0697-15-01E	CI
482553	WELL	AP	07/14/2022	LO	045-24529	CC 0697-10-12E	CI
482554	WELL	AP	07/14/2022	LO	045-24530	CC 0697-10-13E	CI
482555	WELL	AP	07/14/2022	LO	045-24531	CC 0697-15-18E	CI
482556	WELL	AP	07/14/2022	LO	045-24532	CC Federal 0697-15-18W	CI
482557	WELL	AP	07/14/2022	LO	045-24533	CC 0697-15-03E	CI
482558	WELL	AP	07/14/2022	LO	045-24534	CC 0697-10-11E	CI
482593	WELL	AP	07/22/2022	LO	045-24535	CC 0697-10-14E	CI

General Comment:

On 8/4/2023, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction at Laramie Energy LLC's Cascade Creek (CC) 0697-15-08 location in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

- Location Assessment Posting Requirements
- Permitted Location Assessments COA Requirements
- Topsoil Salvage and Protection requirements
- Stormwater
- Location Signage

Refer to the "Location", "Construction" and "Reclamation" section 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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

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

Type OTHER

Comment: Pursuant to Rule 406.c, a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, will be posted in a protected and conspicuous place on location upon commencement of operations with heavy equipment until the conclusion of interim Reclamation.

It was observed in this inspection that a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, have not been posted in a protected and conspicuous place on the Location.

Corrective Action: **Comply with Rule 406.c**Date: 08/04/2023

Type OTHER

Comment: Pursuant to Rule 605.a, from the time of construction until Reclamation is complete, the Operator will post a sign at the entrance to an Oil and Gas Location.

It was observed in this inspection that signage has not been posted at the Location's entrance.

Corrective Action: **Comply with Rule 605.a**Date: 08/04/2023**Emergency Contact Number:**

Comment:

Corrective Action:

Date: _____

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:

Location ConstructionLocation ID: 481743

CDP: _____

Comment: With the use of a sUAS, the Location's disturbance area is calculated to be 7.55 acres; this comports with the Form 2A permitted disturbance requirements.

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
BERMS	Yes		

Comments: Erosion BMPs: **Perimeter of the Working Pad Surface**

Other BMPs: _____

Corrective Action: _____ Date: _____

	No		
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Comments: Erosion BMPs: **Pursuant to the permitted Form 2A #402609520 "Conditions of Approval", ditches along the base of the fill slopes will have rocked check dams.**

It was observed in this inspection that velocity check control measures within the stormwater diversion ditch have not been installed.

Other BMPs: _____

Corrective Action: **Comply with Rule 1002.f and Form 2A permit condition requirements; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.** Date: 08/04/2023

	No		
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Comments: Erosion BMPs: **Pursuant to the permitted Form 2A #402609520 "Conditions of Approval", site degradation control measures will include slope stabilization.**

It was observed in this inspection that BMPs (including control measures) to stabilize, as well as to minimize erosion, degradation and sediment transport at the fill slopes of the Location are missing or insufficient; fill slopes currently unstabilized, bare and exposed; erosion/degradation observed.

Other BMPs: _____

Corrective Action: **Comply with Rule 1002.f and Form 2A permit condition requirements; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.** Date: 08/04/2023

DITCHES	Yes		
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Comments: Erosion BMPs: **Northern and Southern Perimeter, base of fill slopes**

Other BMPs: _____

Corrective Action: _____ Date: _____

	No		
Comments:	Erosion BMPs:	<p>Pursuant to the permitted Form 2A #402609520 "Stormwater Management Plan", and Form 2A "Conditions of Approval", stormwater controls will include a collection trench with drains to a sediment catchment system with a 6-inch outlet pipe in the northwestern portion of the of the WPS.</p> <p>It was observed in this inspection that "outlet" controls leading to "sediment catchment systems" have not been installed.</p>	
	Other BMPs:		
Corrective Action:		Comply with Rule 1002.f, Form 2A permit condition requirements, and the Form 2A permit Stormwater Management Plan; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.	Date: 08/04/202 <div style="text-align: right;">3</div>

	No		
Comments:	Erosion BMPs:	<p>Pursuant to the permitted Form 2A #402609520 "Stormwater Management Plan", and Form 2A "Conditions of Approval", stormwater controls will include diversion ditches along the base of the fill slopes and will tie into two sediment trap systems on the south side and one sediment trap system on the north side. Per the SWMP, the sediment trap control measures were to include a "chase" (outlet).</p>	
	Other BMPs:	<p>It was observed in this inspection that sediment traps with properly engineered outlets have not been installed per the Form 2A #402609520 Conditions of Approval, and the Form 2A permit Stormwater Management Plan.</p>	
Corrective Action:		Comply with Rule 1002.f, Form 2A permit conditions, and the Form 2A permit Stormwater Management Plan; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.	Date: 08/04/202 <div style="text-align: right;">3</div>

WADDLES	No		
Comments:	Erosion BMPs:	<p>Pursuant to the permitted Form 2A #402609520 Conditions of Approval, site degradation control measures will include straw wattles along the toe of all fill slopes</p> <p>It was observed in this inspection that erosion logs (wattles) or other control measures to minimize sediment transport have not been installed at the toe of all fill slopes.</p>	
	Other BMPs:		
Corrective Action:		Comply with Rule 1002.f and Form 2A permit condition requirements; install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.	Date: 08/05/202 <div style="text-align: right;">3</div>

WADDLES	Yes		
Comments:	Erosion BMPs:	<p>Operator has placed a single row of erosion log (straw wattle) along the perimeter of the Location. There are areas along the perimeter where the control measure has not been installed at the toe of the unstabilized slopes and/or the edge of the Location disturbance; sections of wattles have been installed off-site, within undisturbed areas;</p>	
	Other BMPs:	<p>This is not per good engineering requirements, and is inadequate to properly manage runoff and off-site sediment transport; as well as to minimize degradation to offsite, undisturbed areas.</p>	
Corrective Action:		Comply with Rule 1002.f: Install or repair required stormwater and erosion control measures in accordance with good engineering practices, and ensure controls are maintained in a proper functioning condition.	Date: 08/04/202 <div style="text-align: right;">3</div>

Comment:

At time of inspection, only single row of erosion logs have been installed along the perimeter of the Location's disturbance. Erosion logs alone are inadequate to manage runoff for the 7.5 acre Location.

**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: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities				
Facility ID: <u>481743</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482542</u>	Type: <u>WELL</u>	API Number: <u>045-24518</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482543</u>	Type: <u>WELL</u>	API Number: <u>045-24519</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482544</u>	Type: <u>WELL</u>	API Number: <u>045-24520</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482545</u>	Type: <u>WELL</u>	API Number: <u>045-24521</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482546</u>	Type: <u>WELL</u>	API Number: <u>045-24522</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482547</u>	Type: <u>WELL</u>	API Number: <u>045-24523</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482548</u>	Type: <u>WELL</u>	API Number: <u>045-24524</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482549</u>	Type: <u>WELL</u>	API Number: <u>045-24525</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482550</u>	Type: <u>WELL</u>	API Number: <u>045-24526</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482551</u>	Type: <u>WELL</u>	API Number: <u>045-24527</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482552</u>	Type: <u>WELL</u>	API Number: <u>045-24528</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482553</u>	Type: <u>WELL</u>	API Number: <u>045-24529</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482554</u>	Type: <u>WELL</u>	API Number: <u>045-24530</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482555</u>	Type: <u>WELL</u>	API Number: <u>045-24531</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482556</u>	Type: <u>WELL</u>	API Number: <u>045-24532</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482557</u>	Type: <u>WELL</u>	API Number: <u>045-24533</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482558</u>	Type: <u>WELL</u>	API Number: <u>045-24534</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>482593</u>	Type: <u>WELL</u>	API Number: <u>045-24535</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Drill Cuttings				
Comment	Pursuant to the Form 2A Location permit: Cuttings will be dried onsite. Cuttings will be treated and disposed of onsite (along the cut portion at grade, no trench or pit will be used) or at the ACF, a E&P Waste Management Facility proposed in the OGDG. A bermed area on the northeast end of the Location observed; no excavation activities for a trench or pit have been conducted.			
Corrective Action				Date:

Spill/Remediation:

Comment:			
Corrective Action:		Date:	

Emission Control Burner (ECB):			
Comment:			
Pilot:	Wildlife Protection Devices (fired vessels):		

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
SEGREGATION _____

Comment

Pursuant to the permitted Form 2A #402609520 Topsoil protection plan, topsoil depths throughout the Location varied from 8-15 inches, with 7,869 cubic yards estimated to salvaged.

With use of a sUAS, actual topsoil material salvaged is ~10,538 cubic yards (8,782 cubic yards assuming a 20% swell factor). Operator appears to have salvaged, on average, approximately 13 inches of topsoil throughout the disturbance. This appears to comport with Rule 1002.b(2) requirements.

See "Comment #1" regarding soil segregation requirements.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment

See "Comment #1" at the end of this report.

Corrective Action

Comply with Rules 606.c, 1002.b, 1002.c, 1002.f and Form 2A permit condition requirements.

Date **08/04/2023**

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

Pursuant to the "Notice to Operators: Interim Reclamation Procedures for Delayed Operations", Delayed operations may occur if an Operator constructs a well location, but does not drill any wells.

It was observed in this inspection that the Location has been constructed- continuous operations (drilling or subsequent operations) not observed. Pursuant to Form 42 #403200034, "construction is anticipated 10/20/2022 - 11/20/2022"; it has been ~9 months since last Operations appear to have occurred on the Location. Drilling operations or compliance with the NTO required by 11/20/2023.

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>Pursuant to the permitted Form 2A #402609520 Conditions of Approval, site degradation control measures will include slope stabilization of the topsoil stockpiles (seeding, mulching, surface roughening); Topsoil will be stored within a stockpile along the eastern edges of the location, outside of the Working Pad Surface, and will be segregated from all subsurface material; to minimize potential for loss of organic materials, wattles will be placed around the entire perimeter of the topsoil stockpile.</p> <p>It was observed in this inspection that the topsoil stockpiles on the Location have been left unstabilized, bare and exposed; only a single erosion log (straw wattle) has been placed on the outside perimeter of the stockpiles, and not around the entire perimeter. Additionally, it was observed that the topsoil salvaged and placed along the access road also lack protection and stabilization BMPs.</p> <p>It was also observed that BMPs and control measures to prevent weed establishment at the topsoil stockpiles are missing or insufficient; Noxious weeds (Musk thistle, houndstongue) observed establishing on the topsoil stockpiles.</p> <p>Control measures to protect from Undesirable Plant Species, to minimize erosion, degradation, and sediment transport, and controls to ensure topsoil remains segregated from subsoils (fill slope) and/or other horizons are missing or insufficient; topsoil stockpiles at risk to weeds, wind and water erosion.</p>	trujilloam	08/07/2023

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

Document Num	Description	URL
696205143	Inspection Photos and Issue Report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6210391