

**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:

09/19/2023

Submitted Date:

09/21/2023

Document Number:

696205263

FIELD INSPECTION FORM

Loc ID: 335647 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:
 9 Number of Comments
 4 Number of Corrective Actions
 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
, 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	RI

General Comment:

On 9/19/2023, 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, #696204558, #696205100 and #696205150 to document compliance with the following corrective actions:

- Stormwater
- Protection of Soils
- Soil Segregation

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

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; 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.

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
	# 12	
Comment:	12 conductors have been set on Location; a plate has been welded on tops of the conductor pipes, and the cellards have been backfilled in accordance with Rule 406.e.(3). If Operator has not drilled well(s) within 6 months, compliance with Rule 406.e.(4) is required.	
Corrective Action:		Date: _____

Venting:

Yes/No		
Comment:		
Corrective Action:		Date: _____

Flaring:

Type		
Comment:		
Corrective Action:		Date: _____

Location Construction

Location ID: 335647 CDP: _____

Comment:

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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Comments: Erosion BMPs: Previous inspection observed that the sediment trap at the toe of the fill slope, on the south end of the Location had not been constructed in accordance with good engineering practices; BMP inadequate in size to manage runoff from the 3.7 acre WPS; BMP had not been constructed with a properly engineered outlet (outlet lacks geotextile lining in conjunction with rip-rap material, and ~¾ of the spillway lacks any armoring). Inspection required Operator to comply with Rule 1002.f.

Other BMPs: It was observed in this inspection that the sediment trap remains unchanged; BMP inadequate in size and has not been constructed with a properly engineered outlet in accordance with good engineering practices. This CA remains applicable.

Corrective Action: Comply with Rule 1002.f; install or repair control measures in accordance with good engineering practices. **Date:** 08/04/2023

If Operator believes the sediment trap is appropriate in size to manage runoff from the Location, Operator will be required to provide engineering stormwater calculations showing control is adequate.

DITCHES

Comments: Erosion BMPs: Inspection #696205150 commented that the ditch on the western ends of the Location is not per good engineering requirements- BMP remains mostly topsoil material and unconsolidated soils

Other BMPs: It was observed in this inspection that the topsoil appears to have been removed from the ditch area, however, stormwater diversion ditch has not been constructed or maintained in accordance with good engineering practices; ditch lacks a defined channel and remains unconsolidated soils that will contribute to sediment-laden stormwater discharge.

Corrective Action: Comply with Rule 1002.f and install or repair stormwater and erosion control BMPs in accordance with good engineering practices. **Date:** 09/19/2023

WADDLES

Comments: Erosion BMPs: Previous inspections observed that stormwater and erosion control measures had not been implemented along the entire (northern) perimeter of the Location; Silt fence that had been implemented along sections of the perimeter, and at stockpiles had not been maintained in proper functioning condition; erosion logs along South end had not been maintained; Off-site sediment transport was observed. Inspection required Operator to comply with Rule 1002.f by 12/27/2022.

Other BMPs: It was observed in this inspection that erosion logs have been re-installed along the entire northern, eastern and southern perimeter of the Location's disturbance, and at the soil stockpiles on Location.

Control measure appeared to be in proper functioning condition at time of inspection.

This CA has been resolved.

Corrective Action: _____ **Date:** _____

Comment: _____

Corrective Action: _____ **Date:** _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Inspector Name: Trujillo, Aaron

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: 335647 Type: LOCATION API Number: - Status: AC Insp. Status: RI

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 In _____

Comment [See "Comment #1" at the end of this report](#)

Corrective Action **Operator shall submit, attached to a Form 4 Sundry notice, calculations showing the amount of topsoil resource lost on the Location due to improper segregation activities.**

Date **07/14/2023**

1002c. PROTECTION OF SOILS Fail _____

Comment [See "Comment #1" 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 REVEGETATION

Cropland

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 Nos. 696204265, #696204558, #696205100 and #696205150 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>Inspection #696205100 also observed that Operator had failed to ensure topsoils remain properly separated from subsoils; BMPs between the topsoil and fill slopes inadequate; subsoils observed pushed onto sections of the topsoil stockpiles. This inspection also required Operator to comply with 1002.b.(2), and for Operator to coordinate with NW Reclamation Specialist so ECMC Staff are on site during segregation activities; topsoil will be required to be imported to supplement the topsoil resource lost.</p> <p>Inspection #696205150 noted that Operator was in the process of removing subsoils from the topsoil stockpiles, though not completed; Operator failed to coordinate/contact NW Reclamation Specialist to ECMC Staff would be on site during segregation activities. Inspection required Operator to submit calculations showing amount of topsoil resource lost due to improper segregation activities. Inspection also observed that Operator has removed a majority of the stormwater and erosion control measures (silt fence, erosion logs) previously installed at the toe of the topsoil stockpiles and along the perimeter of the Location; additionally, 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... Fugitive dust (wind erosion) from the topsoil stockpiles was observed during inspection.</p> <p>It was observed in this inspection that corrective actions to ensure topsoil remains segregated has been completed; soils have been returned to the stockpiles and erosion logs have been implemented along the perimeter of the soil stockpiles to minimize sediment transport.</p> <p>It was also observed that corrective actions taken by Operator have not been installed in accordance with good engineering practices, or maintained in accordance with 1002.f good engineering requirements; hydromulch has been applied to the soil stockpiles on the northwest and southern ends of the Location and appears to be in proper functioning condition. However, BMPs (hydromulch) to stabilize, and protect the topsoil stockpile on the northeast/east end of the Location from weed establishment, wind and water erosion have not been installed, or maintained in accordance with good engineering practices.</p> <p>Location remains out of compliance with 1002 rules, and the corrective action will remain applicable.</p> <p>To date, the Form 4 Sundry notice with topsoil calculations required by Inspection #696205150 has not been submitted. This CA also remains applicable.</p>	<p>trujilloam</p>	<p>09/21/2023</p>

Attached Documents

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

Document Num	Description	URL
696205264	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6260186