

**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:

10/28/2024

Submitted Date:

10/31/2024

Document Number:

714001414**FIELD INSPECTION FORM**Loc ID 333627 Inspector Name: Mcdonough, Corey On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**ECMC Operator Number: 10749Name of Operator: SIMCOE LLCAddress: 1199 MAIN AVE SUITE 101City: DURANGO State: CO Zip: 81301**Status Summary:**

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

Findings:7 Number of Comments3 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
Fields, Vanessa		vfields@logosresourcesllc.com	All SW Inspections
,		regulatory@logosresourcesllc.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
213910	WELL	PR	02/12/1964	GW	067-05180	COLORADO 32-7 11	RI

General Comment:

On 10/28/2024 Reclamation Specialist Corey McDonough conducted a Reclamation and Stormwater Inspection at Logos Operating's Colorado 32-7-11 Location in La Plata County, Colorado. This disturbance is shared with the Simcoe LLC Schofield A1 well and both operators will be receiving a report. It is the ECMCs expectation that both Operators will coordinate with one another to resolve the compliance issue(s).

During the inspection the following compliance issues were observed

- Stormwater
- Surface Owner Equipment
- Unused Equipment

Refer to the "Stormwater" and "Good House-keeping" section of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

UPDATE - 11/6/2024

On 11/5/2024, Logos Operating LLC submitted Form #403983402 requesting a Factual Review Request.

ECMC Staff have reviewed the Request, and this Field Inspection Report is being updated to address and respond to the Resolution.

CA #200190- Comply with Rule 606. Remove and properly store unused equipment by 11/15/2024.

-Basis for Review: "Corrective action dates are not attainable".

-Operator Comment: "In Process".

CA #200191- Comply with Rule 606. Remove and properly store unused equipment by 11/30/2024.

-Basis for Review: "CA dates are not per the guidelines".

-Operator Comment: "In Process".

CA #200192- Comply with Rule 1002.f. Install or repair required BMPs by 11/8/2024.

-Basis for Review: "Corrective action dates are not attainable".

-Operator Comment: "Logos is respectfully requesting a 30-day extension for the compliance deadline concerning the erosion on the eastern interim reclamation area, due to ongoing weather conditions in the Colorado area. These conditions have delayed our ability to complete the necessary work within the original timeframe.

ECMC Decision "not approved".

1) Operator has not provided any basis regarding why the dates are not attainable; 2) The CA dates have been provided per guidelines and the CA matrix; 3) Stormwater and erosion control BMPs are required to be installed and maintained at all times. Management efforts to ensure BMPs are in proper functioning condition should have been conducted prior to stormwater events and inclement weather conditions.

It is the ECMC's expectation that Locations are in compliance with ECMC Rules and requirements at all times. This Location will remain out of compliance until the corrective actions are addressed; CA and CA dates will remain applicable.

Location				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:				Date: _____
Corrective Action:				
Good Housekeeping:				
Type	UNUSED EQUIPMENT			
Comment:	S/O equipment observed in the southern portion of the interim reclamation area and impacting interim reclamation vegetation establishment. No variance for surface owner to store equipment observed in the well file.			
Corrective Action:	Comply with rule 606. Remove surface owner equipment.			Date: 11/30/2024
Type	UNUSED EQUIPMENT			
Comment:	Unused equipment observed stored in the center of the active pad.			
Corrective Action:	Comply with rule 606. Remove and properly store unused equipment.			Date: 11/15/2024
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment: _____				
<input type="checkbox"/> Multiple Spills and Releases?				
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date: _____
Flaring:				
Type				
Comment:				
Corrective Action:				Date: _____

Inspected Facilities									
Facility ID:	213910	Type:	WELL	API Number:	067-05180	Status:	PR	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____ Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____ Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____ Date _____

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? PassProduction areas stabilized ? Pass

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 Vegetation is progressing within the interim reclamation areas to 1003 standards – Vegetation is mostly perennial grass/desirable species. Continue to monitor and manage location to comply with 1003 vegetation standards.

Corrective Action _____ Date _____

Overall Interim Reclamation In Process**Final Reclamation/ Abandoned Location:**

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

Final Land Use: _____

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		
Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: Erosion and failing stormwater BMPs observed in the eastern interim reclamation area.						
Corrective Action: Comply with rule 1002f. Install or repair required BMPs.						
Date: 11/08/2024						
Pits: NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
403978730	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6769141
714001417	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6769138