

**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:

11/12/2024

Submitted Date:

12/03/2024

Document Number:

718100026**FIELD INSPECTION FORM**

Loc ID 334426	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: 10 Number of Comments 2 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: ECMC Operator Number: <u>10433</u> Name of Operator: <u>LARAMIE ENERGY LLC</u> Address: <u>1700 LINCOLN ST STE 3950</u> City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>				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
334426	LOCATION	AC			-	Gunderson 29-09 Pad	RI

General Comment:

On 11/12/2024, Western Reclamation Work Lead Trujillo conducted an inspection at Laramie Energy LLC's Gunderson/29-09 Pad Location in Mesa County, Colorado.

This inspection is a follow-up to #696206347 to document compliance with the following corrective actions:

- Interim Reclamation
- Stormwater
- Good Housekeeping
- Lines at tanks missing cap/plug

This inspection is also in response to FIRR #403973162 and #403969389 stating CAs have been completed; it was observed in this inspection that the Good Housekeeping and loadline CAs have been resolved; Interim reclamation and stormwater CAs remain outstanding.

Due to technical difficulties, inspector was unable to submit this inspection report within an appropriate timeframe- Operator was provided notice of the compliance issues and corrective action requirements in an email on 11/15/2024.

Refer to the Location, Reclamation and Stormwater 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 inspection that have not been addressed are still applicable.

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

Type	OTHER		
Comment:	Location		
Corrective Action:		Date:	
Type	CONTAINERS		
Comment:			
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 1-800-897-6191 / 911

Corrective Action:

Date: _____

Good Housekeeping:

Type			
Comment:	Inspection #696206347 observed various trash and unused hose/pipe equipment observed stored within tank battery's containment measure. Inspection required Operator to comply with Rule 606.a		
	This CA has been resolved.		
Corrective Action:		Date:	
Type			
Comment:	See Inspection #696206347 for comments regarding weeds.		
Corrective Action:		Date:	

Overall Good: ☒**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
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Comment:	Inspection #696206347 observed lines at tanks were missing required cap/plugs. Inspection required Operator to comply with Rule 603.i. It was observed in this inspection that the CA has been resolved.		
Corrective Action:		Date:	

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	334426	Type:	LOCATION	API Number:	-	Status:	AC	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: RANGELAND, RECREATIONAL

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____ Date _____

1002b. SOIL REMOVAL AND _____

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? _____ 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 [See "COGCC Comments" at the end of this report.](#)

Corrective Action **CA Per Inspection #696206347: Conduct additional reclamation in accordance with ECOMC 1003 series rules. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district.**

Additional CA Per this Inspection: Submit, attached to a Form 4 Sundry Notice, documentation of the reclamation work performed per Inspection #696206347 CA requirements, including seed tags, by 11/22/2024.

Date _____

Overall Interim Reclamation **Fail**

Final Reclamation/ Abandoned Location:

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

Final Land Use: RANGELAND, RECREATIONAL

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: See "COGCC Comments" at the end of this report.

Additional comments per this inspection: Previous inspection observed that BMPs to stabilize the working pad surface, as well as to minimize vehicle tracking and sediment transport, show signs of disrepair. Inspection advised Operator to conduct maintenance to ensure tracking controls remain in proper functioning condition. It was observed in this inspection that tracking/stabilization controls are now in disrepair; the working pad surface lacks stabilization and tracking/degradation is evident.

Corrective Action: CA Per inspection #696206347: Comply with Rule 1002.f and install or repair required stormwater and erosion control BMPs in accordance with good engineering practices, in order to stabilize the slopes, and to minimize erosion, degradation and sediment transport. Ensure erosion controls are implmeneted to stabilize the seeded soils upon completion of additional reclamation work.

CA per this Inspection: Comply with Rule 1002.f by 11/22/2024- Install or repair required tracking/stabilization BMPs at the working pad surface, to minimize tracking, degradation and sediment transport

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>Inspection #696206347 observed interim areas of the Location that are not progressing towards ECMC 1003 Revegetation standards, and that stormwater issues are evident.</p> <p>-Slopes on the north end of the Location are bare and unstabilized soils; Erosion degradation observed.</p> <p>Inspection required Operator to comply with Rules 1003 and 1002.f. Specifically, "Conduct additional reclamation in accordance with ECMC 1003 series rules. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district", and "Ensure erosion controls are implemented to stabilize the seeded soils upon completion of additional reclamation work".</p> <p>Inspection did note that there are areas of the slopes that are bare rock, where uniform vegetative establishment is not expected or feasible, however remaining areas/soils require temporary BMPs until long-term stabilization, such as perennial vegetative establishment, has been achieved.</p> <p>Inspection also observed that stormwater and erosion control BMPs implemented within the southeastern interim areas of the Location (erosion logs) have not been maintained in proper functioning condition resulting in erosion, degradation and sediment transport. Inspection required operator to install or repair BMPs</p> <p>Operator submitted Resolution Nos. 403969389 and 403973162 stating: "BMPS have been repaired. Location raked, seeded and wattles placed"; "Slopes have been repaired"; "BMPS have been repaired".</p> <p>It was observed in this inspection that the erosion logs within the southeastern interim areas have been repaired/maintained- this portion of the CA has been addressed.</p> <p>It was also observed that Operator has installed two erosion logs along the contour of the bare slopes on the north end of the Location. Erosion logs are a temporary control measure used to reduce flow velocities and to capture sediment. No other erosion control measures appear to have been implemented in conjunction with the erosion logs in order to stabilize the slopes, to minimize erosion, degradation and to stabilize the seeded soils per the corrective actions; wattle BMPs alone are insufficient per good engineering practices.</p> <p>Inspector was unable to observe evidence that additional reclamation/seeding efforts had been performed. Operator was provided notice of the compliance issues on 11/15/2024, as well as the requirement to provide documentation of reclamation attached to a Form 4 by 11/22/2024. At time of submitting this inspection report, no Form 4 Sundry has been submitted.</p> <p>These corrective actions remain applicable.</p>	trujilloam	12/03/2024

Attached Documents

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

Document Num	Description	URL
404014110	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6809691
718100027	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6809684