

**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:

12/18/2024

Submitted Date:

12/20/2024

Document Number:

718100118

**FIELD INSPECTION FORM**

Loc ID 487592 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

**Operator Information:**

ECMC Operator Number: 10433  
Name of Operator: LARAMIE ENERGY LLC  
Address: 1700 LINCOLN ST STE 3950  
City: DENVER State: CO Zip: 80203

**Findings:**

- 20 Number of Comments
- 8 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
, Laramie		cogccnotifications@laramie-energy.com	<a href="#">All Inspections</a>
Arauza, Steven		steven.arauza@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
487592	LOCATION	AC			-	Laramie 0993-29-01	CI

**General Comment:**

On 12/18/2024, Western Reclamation Work Lead Trujillo conducted a pre-drill, construction and stormwater inspection at Laramie Energy LLC's Laramie/0993-29-01 Location in Mesa County, Colorado.

Location is within the following High Priority Habitats: Elk Winter Concentration Area.

This inspection is a follow-up to #718100019 to document compliance with the following corrective actions:  
 -2A permit requirements including Stormwater, and Topsoil protections  
 -Stormwater  
 -Stabilization/tracking  
 -Signage requirements

This inspection is also in response to FIRR #4404032156 and #404014711 stating CAs have been completed.

It was observed in this inspection that the Location remains out of compliance with Form 2A and corrective action requirements.

The following new compliance issues were observed during this inspection:  
 -Cutting Trench permitting requirements

Refer to the Location, Location Construction, 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.

**Location**

Overall Good:

**Signs/Marker:**

Type	OTHER		
Comment:	Lease Road / Public Road intersection.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Topsoil		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Form 2A permit posted in tube connected to Location sign.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location signage has been maintained. CA per inspection #718100019 has been resolved.		
Corrective Action:		Date:	

**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 Construction**

Location ID:

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
		Vehicle Trakcing	

Comments: Erosion BMPs: Previous inspection observed that the Working Pad Surface and Access road lacks stabilization. BMPs, including tracking controls to stabilize, as well as to minimize degradation, tracking and transport of sediment are missing or insufficient. Inspection required Operator to Install or repair tracking and erosion control BMPs pursuant to Rule 1002.f by 11/19/2024.

Other BMPs: It was observed in this inspection that additional compaction work appears to have been performed along the working pad surface; no other control measures are apparent; it is unclear if compaction alone will be sufficient in the Long term. It was also observed that tracking/degradation has persisted along the access road; unable to find evidence that BMPs have been installed, or maintained.  
  
CA has not been addressed in its entirety and remains applicable.

Corrective Action: Tracking CA Per Inspection #718100019:

**Date:** \_\_\_\_\_

Install or repair tracking and erosion control BMPs pursuant to Rule 1002.f

DITCHES	Yes		
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Comments: Erosion BMPs: Stormwater diversion ditch along the western perimeter of the Location has been maintained per the SWMP, and will now divert runoff into the SW sediment trap.  
  
This CA has been resolved.

Other BMPs:

Corrective Action:

**Date:** \_\_\_\_\_

	No		
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Comments: Erosion BMPs: Previous inspection observed that the 24" Culvert in conjunction with "Trap w/ rock armored rundown" was not installed along the access road between the stockpond and the Location entrance pursuant to the Form 2A permitted SWMP and Layout Drawing. Inspection required Operator to Install or repair BMPs pursuant to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing by 11/19/2024.

Other BMPs: It was observed in this inspection that the BMPs have not been installed per good engineering practice and Operator's SWMP; culvert and sediment trap BMPs remain missing.  
  
CA has not been addressed in its entirety and remains applicable.

Corrective Action: Access Road Culvert CA Per Inspection #718100019:

**Date:** \_\_\_\_\_

Install or repair BMPs pursaunt to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing

DITCHES	Yes		
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Comments: Erosion BMPs: Stormwater diversion ditch along the working pad surface has been installed. This CA has been resolved.

Other BMPs:

Corrective Action:

**Date:** \_\_\_\_\_

Comments: Erosion BMPs:	Previous inspection observed that the sediment trap on the southwest end of the Location were not installed with engineered inlet/outlet protections pursuant to the Form 2A permitted SWMP and Layout Drawing. Inspection required Operator to Install or repair BMPs pursuant to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing by 11/19/2024.			
Other BMPs:	Limited inspection due to snow cover. However, based on photo documentation attached to Resolution Nos. 404014711 and 404032156, engineered inlet/outlet protections have not been installed.  Original CA and date will remain applicable.			
Corrective Action: Southwester Sediment Trap CA Per Inspection #718100019:			Date: _____	
Install or repair BMPs pursaunt to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing				

Comments: Erosion BMPs:	Previous inspection observed that slope drains (Flex Pipe with rock armor inlet/outlet) on the southwest and west ends of the working pad surface were not installed pursuant to the Form 2A permitted SWMP and Layout Drawing. Inspection required Operator to Install or repair BMPs pursuant to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing by 11/19/2024.			
Other BMPs:	It was observed in this inspection that the BMPs have not been installed per good engineering practice and Operator's SWMP: BMPs have not been installed with armored inlet/outlet protections; BMPs have also not been properly secured.  CA has not been addressed in its entirety and remains applicable.			
Corrective Action: Slope Drain CA Per Inspection #718100019:			Date: _____	
Install or repair BMPs pursaunt to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing				

DITCHES	Yes			
Comments: Erosion BMPs:	Stormwater diversion ditch along the southeastern perimeter of the Location has been maintained per the SWMP, and will now divert runoff into the SW sediment trap.  This CA has been resolved.			
Other BMPs:	_____			
Corrective Action:			Date:	

DITCHES	Yes			
Comments: Erosion BMPs:	Stormwater diversion ditch along the access road has been installed. This CA has been resolved.			
Other BMPs:	_____			
Corrective Action:			Date:	

Comments: Erosion BMPs: Previous inspection observed that the cut and fill slopes of the Location are bare and exposed soils. BMPs to stabilize, as well as to minimize erosion and degradation are missing or insufficient. Inspection required Operator to Install or repair BMPs at the cut/fill slopes pursuant to Rule 1002.f

Other BMPs: It was observed in this inspection that BMPs to stabilize, as well as to minimize erosion and degradation remain missing or insufficient. Slopes remain bare/exposed and at risk of erosion and degradation.

Original CA and date will remain applicable.

Corrective Action: **Cut/Fill Slope CA Per Inspection #718100019:** Date: \_\_\_\_\_

**Install or repair BMPs at the cut/fill slopes pursuant to Rule 1002.f**

Comments: Erosion BMPs: Previous inspection observed that a 24" culvert in conjunction with sediment traps at the inlet and outlet was not installed at the location entrance pursuant to the Form 2A permitted SWMP and Layout Drawing. Inspection required Operator to Install or repair BMPs pursuant to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing by 11/19/2024.

Other BMPs: It was observed in this inspection that the culvert and the sediment traps have been installed, however, the BMPs have not been installed per good engineering practice and per Operator's SWMP: BMPs have not been installed with armored inlet/outlet protections.

CA has not been addressed in its entirety and remains applicable.

Corrective Action: **Culvert, Location entrance CA Per Inspection #718100019:** Date: \_\_\_\_\_

**Install or repair BMPs pursuant to Rule 1002.f, the Form 2A permitted SWMP and Layout Drawing**

**Comment:** \_\_\_\_\_

**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: 487592 Type: LOCATION API Number: - Status: AC Insp. Status: CI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**Environmental**

**Waste Management:**

Type	Management	Condition	GPS (Lat)	GPS (Long)	
Drill Cuttings					
Comment	<p>Pursuant to Form 2A #403325444, drill cuttings will be disposed onsite via a cuttings trench. Cuttings trench has been constructed on the east end of the Location.</p> <p>Pursuant to Rule 908.c, Operators will submit a Form 15 within 30 days after constructing a cuttings trench approved on a Form 2A. Inspection #718100019 dated 11/12/2024 observed that the cuttings trench has been constructed on the east end of the Location.</p> <p>After review of the Location records, it has been determined that a Form 15 has not been submitted.</p>				
Corrective Action	Comply with Rule 908.c				Date: 12/23/2024

**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 \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail

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

Corrective Action **Protection of Soils CA Per Inspection #718100019:  
Comply with Rule 1002.c, 1002.f and Form 2A topsoil protection permit requirements**

Date \_\_\_\_\_

1002E. SURFACE DISTRURBANCE 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

**ECMC Comments**

Comment	User	Date
<p><b>PROTECTION OF SOILS COMMENT</b></p> <p>Inspection #718100019 observed that BMPs to protect, as well as to minimize erosion, degradation and sediment transport are missing from the topsoil stockpile along the access road. Inspection also observed that BMPs to protect, as well as to minimize erosion and degradation are insufficient at this stockpile; soils are bare and at risk to wind and water erosion. Inspection required Operator to comply with Rule 1002.c, 1002.f and Form 2A topsoil protection permit requirements.</p> <p>Though erosion logs have been implemented upslope of the access road soils to manage runoff, it was observed in this inspection that BMPs to protect/stabilize, as well as to minimize erosion and degradation remain missing at the topsoil stockpiled on the Location, and along the access road; soils remain bare/unstabilized and at risk to wind and water erosion.</p> <p>This CA has not been resolved.</p>	trujilloam	12/20/2024

**Attached Documents**

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

Document Num	Description	URL
718100119	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6836541">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6836541</a>