

**FORM  
INSP**Rev  
X/15**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:

04/09/2019

Submitted Date:

04/22/2019

Document Number:

681701205

**FIELD INSPECTION FORM**Loc ID 425510 Inspector Name: Arauza, Steven On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10433

Name of Operator: LARAMIE ENERGY LLC

Address: 1401 SEVENTEENTH STREET #1401

City: DENVER State: CO Zip: 80202

**Status Summary:**

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

**Findings:**

25 Number of Comments

15 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         |
|-----------------|----------------|---------------------------------------|-----------------|
| Pesicka, Conor  |                | conor.pesicka@state.co.us             |                 |
| Wentzel, Dougo  |                | dougo.wentzel@state.co.us             |                 |
| Bankert, Wayne  |                | wbankert@laramie-energy.com           |                 |
| Fischer, Alex   |                | alex.fischer@state.co.us              |                 |
| Colby, Lou      |                | lou.colby@state.co.us                 |                 |
| Prescott, Lorne | (970) 812-5311 | lprescott@laramie-energy.com          |                 |
| Heil, John      |                | john.heil@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 |
|-------------|-------------------------------------|--------|-------------|------------|---------|---|-------------|
| 441238      | CENTRALIZED<br>EP WASTE<br>MGMT FAC | AC     | 06/17/2015  |            | -       | HARRISON CR WTR<br>TRMENT FAC IMPOUND<br>441238 | EI          |

**General Comment:**

COGCC joint Environmental inspection of pit complex and tank battery, follow up to 11/19/2018 Field Inspection Report (doc #681701123). COGCC EPSs S. Arauza and J. Heil conducted inspection. COGCC Reclamation Specialist L. Colby is included as a contact on this inspection report as contact for stormwater management issues observed on inspection date.

Centralized E&P Waste Management Facility (Harrison Creek Water Treatment Facility Impoundments, Facility ID #441238) consists of three lined production pits: Pond 2, Pond 3, and Pond 4. Respective pit dimensions are approximately 470'x340', 300'x600', and 680'x370'. See PITS section of this report for additional information.

Operator was contacted via phone on 4/9/2019 to discuss observations made during this field inspection.

**Location**Overall Good: ☐**Signs/Marker:**

|                    |  |       |  |
|--------------------|--|-------|--|
| Type               | OTHER  |       |  |
| Comment:           | Dewatering system for 'Pond 4' discharges to stormwater ditch on east side of pit complex. COGCC has made recommendation to operator in past communications to install a sign at the discharge area. Operator had not installed sign prior to inspection date. See photos. |       |  |
| Corrective Action: |  | Date: |  |

**Emergency Contact Number:**

|                    |  |             |
|--------------------|--|-------------|
| Comment:           |  |             |
| Corrective Action: |  | Date: _____ |

**Good Housekeeping:**

|                    |  |       |            |
|--------------------|--|-------|------------|
| Type               | WEEDS  |       |            |
| Comment:           | Several instances of vegetation encroaching onto pit liners were observed on inspection date. See photos.  |       |            |
| Corrective Action: | Comply with Rule 603.f. (weeds)  | Date: | 05/03/2019 |
| Type               | UNUSED EQUIPMENT   |       |            |
| Comment:           | Unlabeled 1/4" stainless line on east side of 'Pond 2' lacks any form of protection from truck traffic. Site-wide unused equipment. See photos.  |       |            |
| Corrective Action: | Comply with Rule 603.f. (1/4" line east of Pond 2 & equipment storage throughout equipment).   | Date: | 05/22/2019 |
| Type               | DEBRIS   |       |            |
| Comment:           | Trash and debris observed throughout tank battery containment area, including metal scrap stored inside the southwest corner. Operator was instructed to remove this material via phone on 11/21/2018 and again as a corrective action on related Field Inspection Report, doc #681701123. |       |            |
| Corrective Action: | Immediately remove trash and debris from tank battery berm, per Rule 603.f.  | Date: | 12/10/2018 |
| Type               | UNUSED EQUIPMENT   |       |            |
| Comment:           | Unidentified pipe riser located northeast of valve can between 'Pond 3' and 'Pond 4.' See photos.  |       |            |
| Corrective Action: | Submit identification and description of use for unidentified riser via a Field Inspection Report Resolution form or comply with Rule 603.f. (unidentified riser)  | Date: | 05/22/2019 |
| Type               | TRASH  |       |            |
| Comment:           | ~15 unused tires located east of 'Pond 2,' near monitoring well. Damaged sand bags observed on top of pit liners in several locations. See photos.   |       |            |
| Corrective Action: | Comply with Rule 603.f. (junk tires, sand bags).   | Date: | 05/03/2019 |

Overall Good: ☐**Spills:**

|      |      |        |  |  |
|------|------|--------|--|--|
| Type | Area | Volume |  |  |
|------|------|--------|--|--|

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Tanks and Berms:**

| Contents       | # | Capacity | Type      | Tank ID | SE GPS |
|----------------|---|----------|-----------|---------|--------|
| PRODUCED WATER | 1 | 400 BBLS | STEEL AST |         | ,      |

|                    |  |  |  |  |       |
|--------------------|--|--|--|--|-------|
| Comment:           | NFPA placard and volume label installed by operator in response to previous Field Inspection Report. |  |  |  |       |
| Corrective Action: |  |  |  |  | Date: |

**Paint**

|                  |  |  |  |  |  |
|------------------|--|--|--|--|--|
| Condition        |  |  |  |  |  |
| Other (Content)  |  |  |  |  |  |
| Other (Capacity) |  |  |  |  |  |
| Other (Type)     |  |  |  |  |  |

**Berms**

|                    |   |                     |                     |             |       |
|--------------------|---|---------------------|---------------------|-------------|-------|
| Type               | Capacity  | Permeability (Wall) | Permeability (Base) | Maintenance |       |
| Metal              | Adequate  | Walls Sufficient    | Base Sufficient     | Adequate    |       |
| Comment:           | No visible tears or holes observed in tank battery liner on inspection date. Secondary containment area contained snowmelt on inspection date. No hydrocarbon sheens or odors were observed in fluids. Trash and debris observed inside of containment during inspection. See Housekeeping Section of this report for corrective actions. |                     |                     |             |       |
| Corrective Action: |   |                     |                     |             | Date: |

**Venting:**

|                    |  |  |  |  |       |
|--------------------|--|--|--|--|-------|
| Yes/No             |  |  |  |  |       |
| Comment:           |  |  |  |  |       |
| Corrective Action: |  |  |  |  | Date: |

**Flaring:**

|                    |  |  |  |  |       |
|--------------------|--|--|--|--|-------|
| Type               |  |  |  |  |       |
| Comment:           |  |  |  |  |       |
| Corrective Action: |  |  |  |  | Date: |

| Inspected Facilities |        |       |            |             |   |         |    |               |    |
|----------------------|--------|-------|------------|-------------|---|---------|----|---------------|----|
| Facility ID:         | 441238 | Type: | CENTRALIZE | API Number: | - | Status: | AC | Insp. Status: | EI |

|  |
|--|
|  |
|--|

**Environmental****Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Spill ID #456666 was discovered on 8/11/2018 and reported to COGCC on 8/14/2018 (doc #401732577). Supplemental Spill Report (doc #401765168) was approved with a COA instructing operator to submit a spill closure request via a Supplemental eForm 19.

Corrective Action: Submit an eForm 19 Supplemental Spill Report with a closure request for Spill ID #456666, per COAs included on doc #401765168.

Date: 05/22/2019

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Spill/Remediation:**

Comment: Remediation Project #11939 has been assigned to document operator's delineation and remediation efforts in response to Spill ID #456666.

Corrective Action: Submit an eForm 27 update to Remediation Project #11939. Supplemental F27 Project Update shall address COAs listed on previously-approved F27s (doc #401777422 and #401833896).

Date: 05/22/2019

Emission Control Burner (ECB): \_\_\_\_\_

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

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

## Reclamation - Storm Water - Pit

**Storm Water:**

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
|                  |                 |                         |                       |               |                          |         |

Comment: Site-wide stormwater control issues include: erosion, transport of sediment and rocks into pits, subsidence at valve can located between 'Pond 3' and 'Pond 4', low points along pit berm perimeters, and stormwater transport into pits.

Corrective Action: **Install or repair required BMPs per Rule 1002.f.**

Date: 05/22/2019

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Type: Water Fresh Lined: YES Pit ID: Lat: 39.269975 Long: -107.751975  
 Reference Point: SE Other: Length: 680 Width: 370

**Lining:**

Liner Type: HDPE Liner Condition: Adequate

Comment: No tears or holes were observed in visible portion of liner. Pit has leak detection system on east side. (Pond 4) Unsecured trash can, assorted debris, and unused equipment observed on east side of pit (near leak detection system). Foreign debris observed on pit liner and trash observed on pit fluids in southwest corner. See Housekeeping section for corrective action. See photos.

Corrective Action

Date:

**Fencing:**

Fencing Type: Wildlife Fencing Condition: Adequate

Comment: Pit complex shares 8' chain link fence with 2' of wildlife mesh along bottom and three strands of barbed wire on top.

Corrective Action

Date:

**Netting:**

Netting Type: Netting Condition:

Comment: Pit dewatering sump on east side has damaged sandbag and rock supporting 2" pipe and hoses.

Corrective Action

**Install permanent support structure to support pit dewatering sump discharge piping and to prevent foreign debris from entering sump.**

Date: 06/22/2019

Anchor Trench Present: YES Oil Accumulation: NO 2+ feet Freeboard: YES

Comment: Pit contained fluids on inspection date. Stormwater run-on into pit was observed at several locations around pit.

Operator does not have eForm 15 Pit Permit or Pit Report on file for this pit.

Corrective Action

**Submit an eForm 15 Pit Report to document pit construction, per Rule 903.**

Date: 06/22/2019

Type: Produced Water Lined: YES Pit ID: Lat: 39.268910 Long: -107.751188  
 Reference Point: SE Other: Length: 60 Width: 300

**Lining:**

Liner Type: HDPE Liner Condition: Inadequate

Comment: Pit has leak detection system on east side. (Pond 3). Holes observed in visible portion of liner on south berm. Steel cable entering pit from the south rests directly on pit liner and has caused the formation of ~4" tear in liner. Additional steel cables with metal hardware rest directly on liner at multiple egress ladders. Hose leading to fluid agitator on north side of pit rests directly on pit berm. See photos.

|                                   |  |  |
|-----------------------------------|--|--|
| Corrective Action                 | Repair and liner per Rule 904.b.(2). Submit documentation of liner repair via Field Inspection Report Response Form. Elevate hoses/cables/hardware and remove foreign debris from direct contact with liner to prevent damage.   | Date: 05/22/2019                                       |
| <b>Fencing:</b>                   |  |  |
| Fencing Type: <u>Wildlife</u>     | Fencing Condition: <u>Adequate</u>   |  |
| Comment:                          | Pit complex shares 8' chain link fence with 2' of wildlife mesh along bottom and three strands of barbed wire on top.  |  |
| Corrective Action                 |  | Date:  |
| <b>Netting:</b>                   |  |  |
| Netting Type:                     | Netting Condition:   |  |
| Comment:                          | Operator does not have eForm 15 Pit Permit or Pit Report on file for this pit.   |  |
| Corrective Action                 | Submit an eForm 15 Pit Report to document pit construction, per Rule 903.  | Date: 06/22/2019                                       |
| Anchor Trench Present: <u>YES</u> | Oil Accumulation: <u>NO</u>  | 2+ feet Freeboard: <u>YES</u>                          |
| Comment:                          | Pit contained fluid on inspection date with adequate freeboard. Pit liner appeared to bulge beneath inlets on east side. A similar situation was described at 'Pond 2' resulting in Spill ID #456666.  |  |
| Corrective Action                 | Investigate pit liner bulge/bubble at inlet on east side of 'Pond 3,' provide investigation results via Field Inspection Resolution Form or, if a spill or release is detected, an eForm 19.   | Date: 05/22/2019                                       |
| Type: <u>Produced Water</u>       | Lined: <u>YES</u>  | Pit ID: Lat: <u>39.267206</u> Long: <u>-107.751023</u> |
| Reference Point: <u>SE</u>        | Other: _____   | Length: <u>470</u> Width: <u>340</u>                   |
| <b>Lining:</b>                    |  |  |
| Liner Type: <u>HDPE</u>           | Liner Condition: <u>Inadequate</u>   |  |
| Comment:                          | Pit has leak detection system on east side. (Pond 2). Hole observed in visible portion of liner on south berm. Hose leading to fluid agitator on east side of pit rests directly on pit berm. Foreign debris encroaching on pit berms include damaged sandbags, rocks, and sediment. See photos. |  |
| Corrective Action                 | Repair and liner per Rule 904.b.(2). Submit documentation of liner repair via Field Inspection Report Response Form. Elevate hoses and remove foreign debris from direct contact with liner to prevent damage.   | Date: 05/22/2019                                       |
| <b>Fencing:</b>                   |  |  |
| Fencing Type: <u>Wildlife</u>     | Fencing Condition: <u>Adequate</u>   |  |
| Comment:                          | Pit complex shares 8' chain link fence with 2' of wildlife mesh along bottom and three strands of barbed wire on top.  |  |
| Corrective Action                 |  | Date:  |
| <b>Netting:</b>                   |  |  |
| Netting Type:                     | Netting Condition:   |  |
| Comment:                          | Operator does not have eForm 15 Pit Permit or Pit Report on file for this pit.   |  |
| Corrective Action                 | Submit an eForm 15 Pit Report to document pit construction, per Rule 903.  | Date: 06/22/2019                                       |
| Anchor Trench Present: <u>YES</u> | Oil Accumulation: <u>NO</u>  | 2+ feet Freeboard: <u>YES</u>                          |
| Comment:                          | Pit contained fluid on inspection date with adequate freeboard and no indication of hydrocarbons.  |  |
| Corrective Action                 |  | Date:  |

**Attached Documents**

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

| Document Num | Description           | URL   |
|--------------|-----------------------|---|
| 681701208    | 20190409 Field Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4802361">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4802361</a> |

