

**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: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10433

Name of Operator: LARAMIE ENERGY LLC

Address: 1700 LINCOLN ST STE 3950

City: DENVER State: CO Zip: 80203

**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

**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>

**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 EECMC 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:**

corrective date

Type:

# 12

Comment: Corrective Action: Date: **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

## 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:

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.

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:

\_\_\_\_\_



**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 ammount 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 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 ☐

**COGCC Comments**

Comment	User	Date
<p><b>COMMENT #1</b></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>	trujilloam	09/21/2023

**Attached Documents**

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

Document Num	Description	URL
403538051	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6260190">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6260190</a>
696205264	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6260186">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6260186</a>