

**FORM
INSP**Rev
05/11**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

DE	ET	OE	ES
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Inspection Date:
12/02/2014Document Number:
673401489

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	423735	423735	Waldron, Emily	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 10524Name of Operator: GRMR OIL & GAS LLCAddress: 370 INTERLOCKEN BLVD SUITE 550City: BROOMFIELD State: CO Zip: 80021

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☐ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Kellerby, Shaun		shaun.kellerby@state.co.us	
Griffis, Mike	720-235-5071	mike.griffis@grmroilandgas.com	All GRMR inspections

Compliance Summary:QtrQtr: SENW Sec: 29 Twp: 5N Range: 90W**Inspector Comment:****Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
423734	WELL	PR	03/24/2014	OW	081-07658	HARPER HILL 1-29	PR	<input checked="" type="checkbox"/>
423736	WELL	PR	10/30/2012	OW	081-07659	HARPER HILL 2-29	PR	<input checked="" type="checkbox"/>

Equipment:**Location Inventory**

Special Purpose Pits: <u> </u>	Drilling Pits: <u>1</u>	Wells: <u>2</u>	Production Pits: <u> </u>
Condensate Tanks: <u>1</u>	Water Tanks: <u>3</u>	Separators: <u>2</u>	Electric Motors: <u> </u>
Gas or Diesel Motors: <u>1</u>	Cavity Pumps: <u>2</u>	LACT Unit: <u> </u>	Pump Jacks: <u>2</u>
Electric Generators: <u>3</u>	Gas Pipeline: <u> </u>	Oil Pipeline: <u> </u>	Water Pipeline: <u> </u>
Gas Compressors: <u>2</u>	VOC Combustor: <u> </u>	Oil Tanks: <u>3</u>	Dehydrator Units: <u> </u>
Multi-Well Pits: <u> </u>	Pigging Station: <u> </u>	Flare: <u>1</u>	Fuel Tanks: <u>2</u>

Location**Signs/Marker:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
TANK LABELS/PLACARDS	ACTION REQUIRED	Labels still have previous operator and contact information.	Install sign to comply with rule 210.	01/02/2015

Inspector Name: Waldron, Emily

WELLHEAD	SATISFACTORY			
BATTERY	ACTION REQUIRED	At entrance. Sign still has contact information for previous operator.	Install sign to comply with rule 210.	01/02/2015

Emergency Contact Number (S/A/V): ACTION

Corrective Date: 01/02/2015

Comment: Emergency contact information on location is for previous operator.

Corrective Action: Install current operator emergency contact information.

Good Housekeeping:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
STORAGE OF SUPL	ACTION REQUIRED	Frack tank stored on location without adequate containment.	If tank is in use it needs adequate secondary containment, if it is not in use for production of this lease it needs to be removed from location.	01/02/2015

Spills:

Type	Area	Volume	Corrective action	CA Date
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☐ Multiple Spills and Releases?

Equipment:

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Bird Protectors		SATISFACTORY			
Gas Meter Run	1	SATISFACTORY			
Deadman # & Marked	8	SATISFACTORY			
Horizontal Heated Separator	2	SATISFACTORY			
Other	2	SATISFACTORY	Linear rod pump		
Emission Control Device	2	SATISFACTORY			

Facilities:

☐ New Tank

Tank ID: _____

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	400 BBLS	HEATED STEEL AST	,
S/A/V: SATISFACTORY	Comment:			
Corrective Action:				Corrective Date:

Paint

Condition	Adequate
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Other (Content) _____

Other (Capacity) _____

Other (Type) _____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficent	Base Sufficent	Adequate
Corrective Action				Corrective Date

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Comment				
Facilities:		<input type="checkbox"/> New Tank		Tank ID: _____
Contents	#	Capacity	Type	SE GPS
CRUDE OIL	3	400 BBLS	HEATED STEEL AST	40.359850,-107.523570
S/A/V:	SATISFACTORY		Comment:	
Corrective Action:				Corrective Date:
Paint				
Condition	Adequate			
Other (Content) _____				
Other (Capacity) _____				
Other (Type) _____				
Berms				
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Corrective Action				Corrective Date
Comment				
Venting:				
Yes/No		Comment		
Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Predrill				
Location ID: 423735				
Site Preparation:				
Lease Road Adeq.: _____		Pads: _____	Soil Stockpile: _____	
S/A/V: _____				
Corrective Action: _____		Date: _____	CDP Num.: _____	
Form 2A COAs:				

Group	User	Comment	Date
OGLA	kubeczkod	<p>GENERAL SITE COAs:</p> <p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.</p> <p>Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals, and maintained in good condition.</p> <p>Based on information from the operator, fracing of these horizontal wells is not planned. However, if during the completion process, the operator decides that portions of the production zone will require fracing and stimulation; all flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.</p> <p>The surface soils and materials are fine-grained and highly unconsolidated; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after well pad construction completion, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.</p> <p>Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.</p>	05/11/2011
OGLA	kubeczkod	<p>CONSTRUCTION/DRILLING COA:</p> <p>The drilling pit must be lined, or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling.</p>	05/11/2011

S/A/V: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

BMP Type	Comment
PROPOSED BMPs	<p>Best Management Practices Summary APR 18 2011</p> <p>Harper Hill 1 -29 & 2 -29</p> <p>Stormwater Management Plans (SWMP) are in place to comply with both Colorado Department of Public Health and Environment (CDPHE) and Colorado Oil and Gas Control Commission (COGCC) stormwater discharge permits. The construction layout for Harper Hill 1 -29 & 2 -29 details Best Management Practices (BMP) to be installed</p> <p>during initial construction. Note that BMPs may be removed, altered, or replaced with changing conditions in the field and the SWMP will be updated accordingly.</p> <p>The BMPs prescribed for the initial construction phase include, but are not limited to</p>

- Construction diversion ditch
- Sediment reservoirs
- Check dams
- Level spreaders
- Stabilized construction entrance
- Slash
- Sediment trap
- Wattle
- Terrace
- Secondary containment berms
- Detention ponds

Spill Prevention Plans (SPCC) are in place to address material releases and to prescribe materials handling BMPs for the facility. "Good house - keeping" measures will be taken to ensure proper waste disposal.

Please refer to the attached email from the Colorado Department of Wildlife for Wildlife BMPs.

From: Winters, Edward rmai Ito: Edward.Winters(ostate.co.us)

Sent: Thursday, April 14, 2011 1:43 PM

To: Aleta A. Brown

Cc: Michael. BerostromCalshell.com

Subject: RE: Shell - Harper Hill and Greasewood O &G Locations for Your Review

For Harper Hill:

- Where oil and gas activities must occur in mule deer critical winter range or elk winter concentration areas, conduct these activities outside the time period from December 1 through April 15
- Restrict post - development well site visitations to between the hours of 10:00 a.m. and 3:00 p.m. and reduce well site visitations between December 1 and April 15 in mule deer and elk winter range.
- Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.
- Prior to development, establish baseline vegetation condition and inventory and to provide a basis for post - development habitat restoration.

	<ul style="list-style-type: none"> • Gate single - purpose roads and restrict general public access to reduce traffic disruptions to wildlife. • Close and immediately reclaim all roads that are redundant, not used regularly, or have been abandoned to the maximum extent possible to minimize disturbance and habitat fragmentation. • Avoid aggressive non - native grasses and shrubs in mule deer and elk habitat restoration. • Reclaim mule deer and elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed. • Restore appropriate sagebrush species or subspecies on disturbed sagebrush sites. Use locally collected seed for reseeding where possible. <p>This will address the BMP's that will satisfy CDOW for the Harper Hill location.</p> <p>Thank you,</p> <p>F.d Winters</p> <p>Land Use Specialist</p> <p>Northwest Region</p> <p>PO Box 1181</p> <p>Meeker, Colorado 81641</p> <p>(970) 878.6069</p> <p>edward.winters@state.co.gov</p>
Material Handling and Spill Prevention	Spill Prevention Plans (SPCC) are in place to address material releases and to prescribe materials handling BMPs for the facility.
Construction	The construction layout for Herring Draw #1-9 details Best Management Practices (BMP) to be installed during initial construction.
Construction	<ul style="list-style-type: none"> • Construction diversion ditch • Sediment reservoirs • Check dams • Level spreaders • Stabilized construction entrance • Slash • Sediment trap • Wattle • Terrace • Secondary containment berms • Detention ponds
Storm Water/Erosion Control	Stormwater Management Plans (SWMP) are in place to comply with both Colorado Department of Public Health and Environment (CDPHE) and Colorado Oil and Gas Control Commission (COGCC) stormwater discharge permits.

PROPOSED BMPs	<p>Bird State 32 -8</p> <p>SE NE Section 32, TSS, R64W</p> <p>Arapahoe County, Colorado</p> <p>Stormwater Management & Proposed BMP's</p> <p>Renegade Oil & Gas Company, LLC (Renegade) has in place Stormwater Management Plans for both construction and post - construction activities that ensure compliance with both the Colorado Department of Public Health and Environment (CDPHE) and Colorado Oil & Gas Conservation Commission (COGCC) requirements.</p> <p>The plans provide for various sediment control BMP's that are applied on a site specific basis. These BMP's include fiber rolls, silt fences, straw bales, berms, dams, ditches, culverts, mulching, revegetation, etc. Not all BMP's will be used at each</p> <p>construction site. Renegade, and its consultants, attempt to use BMP's that minimize surface disturbance and adverse environmental impacts.</p> <p>The site for the Bird State 32 -8 is sloping pastureland and will require some moderate cut and fill. Renegade will construct a drill site by moving and segregating the topsoil to the exterior of the drill site. We will then level and berm the entire site, thus providing containment for the entire site, and facilitating interim reclamation by recountouring and then returning the topsoil to the drill site.</p>
General Housekeeping	"Good house-keeping" measures will be taken to ensure proper waste disposal.

S/A/V: _____ **Comment:** _____

CA: _____ **Date:** _____

Stormwater:

Comment: _____

Staking:

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:

Facility

Facility ID: 423734 Type: WELL API Number: 081-07658 Status: PR Insp. Status: PR

Producing Well

Comment:

Facility ID: 423736 Type: WELL API Number: 081-07659 Status: PR Insp. Status: PR

Producing Well

Comment: Pumping.

Environmental**Spills/Releases:**

Type of Spill: Description: Estimated Spill Volume:

Comment:

Corrective Action: Date:

Reportable: GPS: Lat Long

Proximity to Surface Water: Depth to Ground Water:

Water Well:

DWR Receipt Num: Owner Name: GPS : Lat Long

Field Parameters:

Sample Location:

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: No interim reclamation apparent.

1003a. Debris removed? CM

CA CA Date

Waste Material Onsite? CM

CA CA Date

Unused or unneeded equipment onsite? CM

CA CA Date

Pit, cellars, rat holes and other bores closed? CM

CA CA Date

Guy line anchors removed? CM

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CA _____ CA Date _____

Guy line anchors marked? _____ CM _____

CA _____ CA 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 _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

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 _____

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
Gravel	Pass					
		Rip Rap	Pass			
		Gravel	Pass			
Berms	Pass					

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Compaction	Pass				
		Compaction	Pass		

S/A/V: SATISFACTOR
Y
Corrective Date: _____

Comment: No apparent soil migration; erosion or soil movement.

CA: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
673401493	Incorrect operator on battery sign	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497503
673401494	Incorrect operator on tank labels	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497504
673401495	No interim reclamation apparent	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497505
673401496	Tank stored on location	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497506

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)