



STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Fwd: CA's Insp Doc#680100888

1 message

Neidel - DNR, Kris <kris.neidel@state.co.us>

Mon, Jul 11, 2016 at 2:45 PM

To: OGCC EnviroScan - DNR <dnr_ogcc.enviroscan@state.co.us>

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COLORADO
 Oil & Gas Conservation
 Commission
 Department of Natural Resources

----- Forwarded message -----

From: **Colby - DNR, Lou** <lou.colby@state.co.us>

Date: Fri, Jul 8, 2016 at 3:40 PM

Subject: CA's Insp Doc#680100888

To: Randy Edelen <r.edelen@grynberg.com>

Cc: R.Miller@grynberg.com, Denise Arthur - DNR <denise.arthur@state.co.us>, Margaret Ash - DNR <margaret.ash@state.co.us>, Kris Neidel - DNR <kris.neidel@state.co.us>

Dear Mr Edelen :

This email is in response to your email to me dated July 6th 2016, 7:40 PM..

After discussion with my supervisor I must inform you that the below referenced email is inadequate response to address Corrective Actions in Inspection Doc#680100888. The Corrective Action date of 7/6/2016 still stands to install Stormwater controls..

Sincerely

Lou Colby

Hello Lou,

I have reviewed the COGCC SOP for stormwater management and after referencing this document believe we have adequate measures in place. We have met ALL 5 of the objectives listed in the SOP:

1. Maintaining surface water quality (Rule 1002.f.(2)A).
2. Minimizing erosion and limiting site degradation (Rule 1002.f.(2)).
3. Ensuring proper surface reclamation (Rules 1002.e.(1), 1003 and 1004).
4. Minimizing alterations of natural features (Rule 1002.e.(1)).
5. Minimizing adverse impacts to wildlife habitat (Rule 1002.e.(3))

There is a good chance that some of these objectives would be compromised if additional measures are implemented beyond the current non-structural BMP. We will continue to inspect the location after any events and insure the integrity of the site. We have not experienced any runoff/runoff, site stability issues, erosion, or any degradation of the location; due to the effectiveness of the planning and design of the project. This design mitigates the need for structural BMP and insures robust compliance with the objectives. This compliance level will be degraded if structural bmp are implemented on this location.

Please do not hesitate to contact me if you have any questions or I can help you meet your goals.

Thanks,

Randy Edelen, P. E.

Grynberg Petroleum Company

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Laura Colby

NW Reclamation Specialist

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