

State of Colorado  
Oil and Gas Conservation Commission

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401176656  
Date Issued:  
01/04/2017  
Date Resolved:

NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 522, the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV). Per Rule 523, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

OPERATOR INFORMATION

OGCC Operator Number: 36200  
Name of Operator: GRYNBERG\* JACK DBA GRYNBERG PETROLEUM CO  
Address: 3600 S. YOSEMITE ST - STE 900  
City: DENVER State: CO Zip: 80237-1830  
Contact Name and Telephone:  
Name: Jack Grynberg  
Phone: (303) 850-7490 Fax: ( )  
Email: grynpetro@grynberg.com

Well Location, or Facility Information (if applicable):

API Number: 05-123-06129-00 Facility or Location ID:  
Name: GRAEFE Number: 1  
QtrQtr: SWNW Sec: 26 Twp: 9N Range: 62W Meridian: 6  
County: WELD

ALLEGED VIOLATION

Rule: 210.b  
Rule Description: Signs & Markers- Wells & Batteries  
Initial Discovery Date: Was this violation self-reported by the operator? No  
Date of Violation: Approximate Time of Violation:  
Was this a discrete violation of obvious duration? No  
Description of Alleged Violation:  
Pursuant to Rule 210.b.(2), within 60 days of installation, Grynberg\* Jack DBA Grynberg Petroleum Co (Operator) is required to install a permanent sign for batteries that provides well names associated with the battery. A battery at the Graefe 1 well location, API 123-06129, is associated with Operator's Croissant #1 well, API 123-21426. During an inspection of the Graefe 1 well location on July 13, 2016, COGCC staff observed that the sign for the battery did not provide the name of the Croissant #1 well that is associated with the battery (Document #684901699). Document #684901699 required Operator to install a sign that named the Croissant #1 well and was compliant with Rule 210 by September 13, 2016. During an inspection of the Graefe 1 well location on November 3, 2016 (Document #684902505), COGCC staff observed the battery still did not have a sign identifying the associated Croissant #1 well. Operator failed to install a sign for the battery at the Graefe 1 well location that identifies it is associated with the Croissant #1 well and failed to timely complete corrective actions required by Document #684901699, violating Rule 210.b.(2).  
Abatement or Corrective Action Required to be Performed by Operator: Corrective Action Due Date: 09/13/2016  
**Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.**  
Operator shall immediately install a sign at the battery that names the Croissant #1 well and brings the signage into compliance with Rule 210. In its Rule 522.d.(2) NOAV Answer, Operator shall provide an explanation of how the requirements of Rule 210 will be complied with in the future and how COGCC required Corrective Actions will be timely completed

Rule: 605.a.(4)  
Rule Description: Oil & Gas Facilities- Berms  
Initial Discovery Date: Was this violation self-reported by the operator? No  
Date of Violation: Approximate Time of Violation:



submitted for prior approval in accordance with Rule 909.c. In its Rule 522.d.(2) NOAV Answer, Operator shall provide an explanation of how the requirements of Rule 906.a. will be complied with in the future and how COGCC required Corrective Actions will be timely completed.

### PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 523, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

### ANSWER

Pursuant to Rule 522.d.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgement may be entered. Hard copy answers are filed with the Commission Secretary at the Commission's Denver office and should also be emailed to [dnr\\_cogccenforcement@state.co.us](mailto:dnr_cogccenforcement@state.co.us).

### NOAV ISSUED

NOAV Issue Date: 01/04/2017

COGCC Representative Signature: \_\_\_\_\_

COGCC Representative: Steven Mah

Title: NOAV Specialist

Email: steven.mah@state.co.us

Phone Num: (303) 894-2100x5172

### CORRECTIVE ACTION COMPLETED

Rule: 210.b

Rule Description: Signs & Markers- Wells & Batteries

Corrective Action Start Date: \_\_\_\_\_

Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? \_\_\_\_\_

Description of Actual Corrective Action Performed by Operator

Rule: 605.a.(4)

Rule Description: Oil & Gas Facilities- Berms

Corrective Action Start Date: \_\_\_\_\_

Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? \_\_\_\_\_

Description of Actual Corrective Action Performed by Operator

Rule: 605.d

Rule Description: O&G Facilities - Mechanical Conditions

Corrective Action Start Date: \_\_\_\_\_

Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? \_\_\_\_\_

Description of Actual Corrective Action Performed by Operator

Rule: 906

Rule Description: Spills and Releases

Corrective Action Start Date: \_\_\_\_\_

Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? \_\_\_\_\_

Description of Actual Corrective Action Performed by Operator

## FINAL RESOLUTION

Cause #: _____	Order #: _____	Docket #: _____
Enforcement Action: _____	Final Resolution Date: _____	
Final Resolution Comments: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		

## ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
401177368	NOAV COVER LETTER
401177369	NOAV CERTIFIED MAIL RECEIPT
401177382	NOAV ISSUED

Total Attach: 3 Files