

**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:

10/24/2017

Submitted Date:

10/24/2017

Document Number:

682402931**FIELD INSPECTION FORM**
 Loc ID 441995 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_
**Operator Information:**OGCC Operator Number: 36200Name of Operator: GRYNBERG\* JACK DBA GRYNBERG PETROLEUM COAddress: 3600 S. YOSEMITE ST - STE 900City: DENVER State: CO Zip: 80237-**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**8 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
,		r.edelen@grynberg.com	<a href="#">All inspections</a>
,		dnr_cogccenforcement@state.co.us	
Andrews, Doug		doug.andrews@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
449609	WELL	XX	03/11/2017		123-44404	Grynberg Stateline Federal 24-12-65-4-NH	CI

**General Comment:**

This is a Construction and Stormwater Inspection in response to Form 42: Notice of construction- Document #401425452. This location is being referred to Enforcement.

**Location Construction**

Location ID: 441995 CDP: \_\_\_\_\_

**Comment:** This location is not in compliance with the approved Form 2A (Document #401005112). Form 2A was permitted for 7.40 acres of disturbance during construction. Field collected data on October 24, 2017 using a Trimble handheld GPS would indicate construction disturbance was exceeded by approximately 1.55 acres, totaling 8.95 acres. This issue is being forwarded onto OGLA staff for further review. Refer to the attached inspection photos for more detail.

**Corrective Action:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Form 2A COAs:**

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

**Corrective Action:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Wildlife BMPs:**

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

**Corrective Action:** \_\_\_\_\_ **Date:** \_\_\_\_\_

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

**Corrective Action:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**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:

\_\_\_\_\_



**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

Pass

Comment

Appears topsoil was salvaged and stored along the western perimeter of the location.

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ In Process

Comment

Per Rule 1002, all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Per Rule 1002, BMPs to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Operator shall consider both short and long-term stabilization BMPs when stabilizing all stockpiles.

At the time of this inspection, there were no observed stabilization BMPs on the topsoil stockpile.

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE 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 ☐

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p><b>Comment:</b> This location is not in compliance with Reclamation rules. At the time of this inspection, Operator was starting to install straw wattle BMPs along the southeastern location. Per Form 42 Document #401425452 (Notice of construction), construction activities commenced on October 12, 2017. Based on these inspection observations, Operator failed to install stormwater and erosion control BMPs prior to, or at, the start of construction. Straw wattle BMPs are only temporary BMPs and should be used in conjunction with other BMPs. Sediment discharge off location from wind erosion was evident along the northeast, east, and southeast areas of the location. See COGCC comments for additional compliance information regarding stormwater management.</p> <p><b>Corrective Action:</b> Operator shall install stormwater and erosion control BMPs prior to, or at, the start of construction; therefore, the corrective action date is based off the Form 42 start of construction date.</p> <p><b>Date:</b> 10/12/2017</p>						
<p><b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**COGCC Comments**

Comment	User	Date
A follow-up inspection will occur at a future date to ensure the Operator is in compliance with 1000 series Rules.	binschusc	10/24/2017
More permanent BMPs should be installed to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation per Rule 1002.f.(2). Operator shall implement BMPs in accordance with good engineering practices per Rule 1002.f.(2).	binschusc	10/24/2017

**Attached Documents**

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

Document Num	Description	URL
682402932	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4283276">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4283276</a>