

**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:

01/03/2018

Submitted Date:

01/05/2018

Document Number:

682403162**FIELD INSPECTION FORM**
 Loc ID 441995 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 10673Name of Operator: GADECO LLCAddress: 3600 SOUTH YOSEMITE STREET SUITE 900City: DENVER State: CO Zip: 80237**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:14 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		mgriggs@sierra-hamilton.com	
		dnr_cogccenforcement@state.co.us	
		jmorgan@sierra-hamilton.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
449609	WELL	DG	10/29/2017		123-44404	Grynberg Stateline Federal 24-12-65-4-NH	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater inspection to Field Inspection Report Document #682402931 and in response to Field Inspection Report Resolution Document #401464651 stating that corrective actions have been performed. Where the corrective action from the previous inspection report remains unresolved, the corrective action date remains unchanged. This location is being referred to Enforcement.

Location Construction

Location ID: 441995 CDP: _____

Comment: Operator has submitted a change in location disturbance size of 9.29 acres (Document #401464525 still IN-PROCESS).

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:

Inspected Facilities									
Facility ID:	449609	Type:	WELL	API Number:	123-44404	Status:	DG	Insp. Status:	RI

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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

Information copied from previous inspection.

Appears topsoil was salvaged and stored along the western perimeter of the location. Refer to the attached inspection photos for more detail.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process

Comment

Since the previous inspection, it appears the Operator has temporarily stabilized the topsoil stockpile with hydromulch. Operator shall consider long-term stabilization BMPs when stabilizing all stockpiles, as hydromulch is only a temporary BMP.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail

Comment

This location is not in compliance with Site Preparation and Stabilization Rule 1002.e.(1). Operator has failed to stabilize the well pad to reasonably control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination. See the Stormwater Section for the corrective action and corrective action date.

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 ? Fail
- 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 REVEGETATIONCropland

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 Operator shall reclaim all areas not needed for production operations per Rule 1003 standards within 6-months from the rig release date of November 9, 2017.

Corrective Action Date _____

Overall Interim Reclamation Fail

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
Sediment Traps	Fail					Not properly sized or engineered properly
Ditches	Fail	Tracking Pad	Pass			Ditches have not been properly installed
Check Dams	In Process					Could not observe all due to snow accumulation
Hydro Mulch	Pass					Applied to cut and fill slopes and topsoil

Comment: This location is not in compliance with Stormwater Management Rule 1002.f.(2). Operator has failed to implement stormwater BMPs in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Sediment discharge off location is evident due to wind erosion from unconsolidated soil material from the well pad. Operator has failed to stabilize the southern and northern well pad areas which appear to be the cause of wind erosion off location. Operator has not installed sufficient sediment traps for a total disturbance of 9.29 acres. One sediment trap (size ~3'x3'x2') was observed at location which has not been installed with good engineering practices.

Corrective Action: Install or repair required BMPs in accordance with good engineering practices per Rule 1002.f.(2). Corrective actions from the previous inspection were not resolved; therefore, the corrective action date on this inspection remains the same from the previous inspection.

Date: 10/12/2017

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Sediment discharge was observed during the October 24, 2017 inspection and appears to have exacerbated based off this January 3, 2018 inspection.	binschusc	01/04/2018
Since the October 24, 2017 inspection, a Change of Operator from GRYNBERG* JACK DBA GRYNBERG PETROLEUM CO (Operator #36200) to GADECO LLC (Operator #10673) has been certified (Document #401246928).	binschusc	01/04/2018
COGCC Staff contacted and communicated to the Operator to address the stormwater management issue as soon as possible. COGCC staff recommends the Operator consult with a qualified stormwater management contractor.	binschusc	01/05/2018

Attached Documents

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

Document Num	Description	URL
682403174	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4342000