

**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
,		dnr_cogccenforcement@state.co.us	
		jmorgan@sierra-hamilton.com	
		mriggs@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:

\_\_\_\_\_



**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 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 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
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
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
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

**Attached Documents**

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

Document Num	Description	URL
401504507	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4342002">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4342002</a>
682403174	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4342000">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4342000</a>