

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

401615466

Date Received:

04/24/2018

FIR RESOLUTION FORM

CA Summary:

2 of 2 CAs from the FIR responded to on this Form

0 CA Completed
2 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10673

Name of Operator: GADECO LLC

Address: 3600 SOUTH YOSEMITE STREET SUITE 900

City: DENVER State: CO Zip: 80237

Contact Name and Telephone:

Name: _____

Phone: () Fax: ()

Email: _____

Additional Operator Contact:

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*

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Griggs, Mary

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COGCC INSPECTION SUMMARY:

FIR Document Number: 682403487

Inspection Date: 04/16/2018

FIR Submit Date: 04/18/2018

FIR Status: _____

Inspected Operator Information:

Company Name: GADECO LLC

Company Number: 10673

Address: 3600 SOUTH YOSEMITE STREET SUITE 900

City: DENVER State: CO Zip: 80237

LOCATION - Location ID: 441995

Location Name: Grynberg Stateline Federal Number: 24-12-65-4 Pad County: _____

Qtrqtr: NWN Sec: 24 Twp: 12N Range: 65W Meridian: 6

Latitude: 40.999203 Longitude: -104.615686

FACILITY - API Number: 05-123-00 Facility ID: 441995

Facility Name: Grynberg Stateline Federal Number: 24-12-65-4 Pad

Qtrqtr: NWN Sec: 24 Twp: 12N Range: 65W Meridian: 6

Latitude: 40.999203 Longitude: -104.615686

CORRECTIVE ACTIONS:

1 CA# 115922

Corrective Action: This has been referred to enforcement. Corrective actions will be forthcoming per the NOAV.

Date: _____

Response: FACTUAL REVIEW REQUEST

Basis for Review: Requested documentation was submitted prior to the inspection

Operator Comment: In the section "1002E. Surface Disturbance Minimization," It states the location was overbuilt by 1.6 acres. The Operator submitted a sundry (Doc # 401464525) on Nov. 20, 2017 requesting the Agency to size the location to 9.29 acres, to match the BLM permit. The Operator has not received an approval or disapproval of this request. The location does not exceed the 9.29 acres. The fence is built larger than the location in order to keep cattle away from interim reclamation efforts. The sediment has migrated past the location. The Operator has been and continues to work to stop the sediment migration.

COGCC Decision: **Not Approved**

COGCC Representative: Operator information is not sufficient for this Factual Review. This is not an appropriate Factual Review request. Corrective actions remain unchanged.

COGCC Supervisor: Operator information is not sufficient for this Factual Review. This is not an appropriate Factual Review request. Corrective actions remain unchanged.

2  CA# 115923

Corrective Action: This has been referred to enforcement. 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

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: The Operator continues to work on stabilizing the sediment on the well pad. The synthetic co-polymer tacking agent applied on the well pad was working well after the application. Inspection #401594057, responded to earlier this month, details the reclamation work that has taken place. According to the Inspector, the tacking agent is no longer holding the sediment in place.
The Operator continues to work to stabilize the sediment on the well pad, and other areas that are not currently stabilized for wind erosion. The Operator sent our their team of experts to evaluate the site after this Inspection. The site visit was made 4/23/18. Please see the attached documents including photographs and workplan. In summary, we will re-apply the synthetic co-polymer tacking agent to the affected well pad areas. A colorant will be applied to better visually discern the area of application. The cut slope areas to the east and selected areas east of the well pad will have an application of hydromulch. Areas where seed is currently sprouted and growing will be left alone, as our experts have documented that re-growth is occurring.
All corrective action and interim reclamation is not expected to be completed by May 9, 2018. We have experienced greater than average wind conditions and less than average precipitation, which has exacerbated the site conditions, though recent moisture may improve conditions. The Operator is in the process of preparing a variance request to delay the completion of interim reclamation, until Nov. 30, 2018.

COGCC Decision: **Not Approved**

COGCC Representative: Operator information is not sufficient for this Factual Review. This is not an appropriate Factual Review request. Corrective actions remain unchanged.

COGCC Supervisor: Operator information is not sufficient for this Factual Review. This is not an appropriate Factual Review request. Corrective actions remain unchanged.

OPERATOR COMMENT AND SUBMITTAL

Comment: Please see attachments.
The Operator is continuing reclamation work on the site. Final interim reclamation, which will include re-contouring of the cut and fill slopes, and placement of topsoil from the soil stockpile is planned for later in the Summer, in efforts to not disturb the surface any more than is necessary during the windy season.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Mary C. Griggs

Signed: _____

Title: Director for Receiver

Date: 4/24/2018 2:26:48 PM

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>
401615466	FIR RESOLUTION SUBMITTED
401618434	Site diagram for reclamation actions
401618471	Reference Photo - sprouting grass through sediment
401618478	Reference Photo - sprouting grass through sediment
401618490	Reference Photo - SE fill slope - needs hydromulch
401618516	Reference Photo - N of access road - needs hydromulch
401618526	Reference Photo - Outside of affected area
401618546	Consultant & contractor evaluation

Total Attach: 8 Files