

**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:

08/21/2018

Submitted Date:

08/22/2018

Document Number:

682503765**FIELD INSPECTION FORM**Loc ID 453036 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 35080Name of Operator: GRAND MESA OPERATING COAddress: 1700 N. WATERFRONT PKWY BL 600City: WICHITA State: KS Zip: 67206**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**15 Number of Comments12 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
Housey, Melissa		melissa.housey@state.co.us	
		HHSKA@kitcarsoncounty.org	
Brewer, Phyllis	(316) 265-3000	pbrewer@gmocks.com	
Arthur, Denise		denise.arthur@state.co.us	
Reilly, Pat	316-265-3000	preilly@gmocks.com	
		al.stafford@state.co.us	CDPHE
Reilly, Michael	(316) 265-3000	mreilly@gmocks.com	Principal Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
453035	WELL	DG	08/06/2018		073-06733	YOSEMITE 1-3	RI

General Comment:

This is a reclamation inspection with an emphasis in stormwater and good housekeeping. Any corrective action(s) from previous inspections that have not been addressed are still applicable.

Location

Lease Road:			
Type	Access		
comment:	Putting evident on areas of the access road to the south of the location. See photo 42. Water appears to have ponded in this area. Evidence of vehicle traffic traveling off the access road to avoid this area. Access road will require maintenance and BMPs installed to allow for appropriate vehicular travel, and to minimize unnecessary land disturbances in accordance to 1002.e(4)		
Corrective Action:	Minimize off-location disturbances in accordance to Rule 1002.e(4). Conduct maintenance on access road and implement BMPs as needed to facilitate travel.	Date:	08/21/2018

Overall Good: ☐

Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	Barrels observed on the south end of the pad lack the appropriate labeling in accordance to 210.d. Barrels will require appropriate labeling if not removed from location. See photos 28-31		
Corrective Action:	Install labeling to comply with Rule 210.d.	Date:	08/23/2018

Emergency Contact Number:			
Comment:			
Corrective Action:			
	Date: _____		

Good Housekeeping:			
Type	STORAGE OF SUPL		
Comment:	2A permitted disturbance 2 acres, Oil and gas location disturbance expanded an additional 1.12 acres. In addition, Oil and gas activities are being conducted outside the excavated, expanded location on an undisturbed, unpermitted surface; oil and gas equipment stored beyond areas of the constructed pad and fence. See photos 5, 24-25, 28-32		
Corrective Action:	Provide immediate notice via FIRR when equipment has been removed from areas beyond the permitted disturbance area. Any additional disturbances will require reclamation in accordance to COGCC 1000 series rules. The corrective action date will be based on the Form 42, document 401710401, construction start date, 7/25/2018.	Date:	07/25/2018

Overall Good: ☐

Spills:				
Type	Area	Volume		
In Containment: No				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 453036 CDP: _____

Comment: Even though this is not a construction inspection, multiple stormwater issues have been identified and individual corrective actions will be addressed in this section. Stormwater controls need to be installed in accordance with good engineering practices before location construction., Based on the Form 42, document 401710401, construction started on 7/25/2018

Corrective Action: _____ Date: _____

Form 2A COAs:Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:Comment: _____

Corrective Action: _____ Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present

Comments: Erosion BMPs: _____

Other BMPs:

Operator has implemented insufficient surface roughening on the western and eastern perimeter of the location. Surface roughening appears inadequate and is not being used in conjunction with other BMPs

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f

Date: 07/25/2018

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Comments: Erosion BMPs: _____

Other BMPs:

Insufficient perimeter stormwater and erosion control BMPs; sufficient controls have not been installed or maintained on the northern and southern perimeter of the location in accordance to 1002.f and permit-required COAs per the 2A doc. #401333215

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f and COAs

Date: 07/25/2018

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Comments: Erosion BMPs: _____

Other BMPs:

It appears as though berms have been constructed utilizing topsoil. Topsoil should not be used as stormwater berms due to berms requiring compaction in accordance to good engineering practices, which would damage/alter the soil structure of the topsoil.

Berms have not been constructed in accordance with good engineering practices; berms have not been sufficiently compacted and is considered a sediment source.

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f

Date: 07/25/2018

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Comments: Erosion BMPs:

Other BMPs:

Various chemicals/fluids from drilling operations appear to be ponding on the north end of the pad rather than the intended production pit. This is a potential stormwater pollutant source.

Corrective Action: Remove ponding chemicals from the pad. Contaminated soils will require cleaning/remediation or removal. Provide us with information identifying fluid constituents ponding on the pad.

Date: 08/27/2018

Comments: Erosion BMPs:

Other BMPs:

Four (4) barrels observed being stored on the ground on the south end of the location (two observed beyond the south end of the fenced area). One barrel was observed being stored with the top placed open and down upon the surface of the soil. Two gas cans observed next to the trailers on the west end of the pad. Materials being stored on the northwest corner of the pad appear to have been spilled onto the location. This is improper materials management and possible stormwater pollutant source.

Containers (barrels, cans) need to be placed in secondary containment or removed and properly stored or disposed. Barrels missing the required labeling. See "Signs/Markers"

Corrective Action:

Immediately store barrels/containers within secondary containment or remove and properly store or dispose. Any contamination to the soil surface will need to be cleaned/remediated. Operator will also be required to provide MSDS sheets for the barrels, including a manifest of where barrels were taken to if removed/disposed, and a manifest of any contaminated soils that were cleaned up. Submit records via form 4.

Date: 08/21/2018

Comments: Erosion BMPs:

Other BMPs:

Work/Office trailers on the west end of the pad appear to have discharged sewage onto the pad. See attached photo document. Sewage discharge is a stormwater pollutant source in accordance to 1002.f and a public health and safety issue. It is also likely a violation of the Lincoln county health de

Location is within a designated sensitive area. This is also in violation of 602.h which requires sanitary facilities to be sufficiently self contained during drilling operations. This is also a possible violation of Colorado's regulation 43 On-Site Waste Water Treatment Act and Lincoln County Health Department regulations.

Corrective Action: Immediately cease and desist sewage discharge from sanitary facilities. Immediately remove and properly dispose sewage from location. Soils will require removal and proper disposal, or cleaning/remediation. A corrective action date of 8/6/2018 is being provided as this is the SPUD date.

Date: 08/06/2018

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: _____

Inspector Name: Trujillo, Aaron

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 _____ Fail _____

Comment It does not appear as though sufficient topsoil salvage on the location has been conducted.Corrective Action Provide total cubic yards of topsoil salvaged and stored on this location.Date **08/24/2018**

1002c. PROTECTION OF SOILS _____ Fail _____

Comment Topsoil salvaged from location, and topsoil stockpile appears that it is being used as a stormwater berm (although not compacted). This is not protective of topsoils due to risk of mixing with other subsoil horizons, and risk of being transported off location and stormwater sediment. See stormwater for additional comments regarding topsoil used in BMPs.Corrective Action Seperate, store and identify topsoil in accordance to COGCC 1000 series rules. A corrective action date of 7/25/2018 is being used based on the Form 42, document 401710401, notice of construction.Date **07/25/2018**

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 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 _____

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

Comment: Corrective Action: Date: **Pits:** ☐ NO SURFACE INDICATION OF PITType: Lined: NOPit ID: Lat: Long: Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition: Comment:

SEE "COGCC COMMENTS" FOR COMMENT REGARDING DRILLING PIT

Provide chemical inventory, in a readily reviewable/accessible format (such as a PDF file, excel, etc....) of any chemical products brought to the well site for use downhole during drilling by 8/27/2018

Date: 08/27/2018cCorrective Action:

Based on the review of the inventory, additional testing may be required for drilling pit closure.

Fencing:Fencing Type: Fencing Condition: Comment: Corrective Action: Date: **Netting:**Netting Type: Netting Condition: Comment: Corrective Action: Date: Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard: Comment: Corrective Action: Date: **COGCC Comments**

Comment	User	Date
Operator was contacted via phone on 8/22/2018 regarding issues with sewage discharge, material handling and stormwater as actions needed to be addressed immediately.	trujilloam	08/22/2018
PIT COMMENT	trujilloam	08/22/2018
Drilling Pit, NE corner of location. 205.b requires operators to maintain MSDS sheets for any Chemical Products brought to a well site for use downhole during drilling, completion, and workover operations, excluding hydraulic fracturing treatments. With the exception of fuel as provided for in Rule 205.c., the reporting and disclosure of hydraulic fracturing additives and chemicals brought to a well site for use in connection with hydraulic fracturing treatments is governed by Rule 205A.		

COA required controls/BMPs to mitigate potential contaminants into nearby surface water. Drainage on the north end of the pad. No stormwater or erosion control BMPs along the northern or southern ends of the location. See "Stormwater". 2A doc. #453036 states size of disturbance area during construction will be 2 acres in size. GPS measurements were conducted indicating that the disturbance area, not including the fenceline, is 3.12 acres in size. It appears location has been constructed in exceedance of the permitted disturbance area per the 2A. These issues, and issues above are being considered for enforcement.

trujilloam

08/22/2018

Attached Documents

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

Document Num	Description	URL
682503766	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4559389