

**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: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 35080
Name of Operator: GRAND MESA OPERATING CO
Address: 1700 N. WATERFRONT PKWY BL 600
City: WICHITA State: KS Zip: 67206

Findings:

- 15 Number of Comments
- 12 Number of Corrective Actions
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
		al.stafford@state.co.us	CDPHE
Reilly, Pat	316-265-3000	preilly@gmocks.com	
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, 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:	Rutting 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: <input type="checkbox"/>			
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:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>
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: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
In Containment: No			
Comment:	<input type="text"/>		
<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: 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

Other BMPs: 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

Erosion BMPs	Present	Other BMPs	Present

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

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

Comments: Erosion BMPs:
 Other BMPs:

Corrective Action: **Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f and COAs** Date: **07/25/2018**

Comments: Erosion BMPs:
 Other BMPs:

Corrective Action: **Remove ponding chemicals from the pad. Contaminated soils will required cleaning/remediation or removal. Provide us with information identifying fluid constituents ponding on the pad.** Date: **08/27/2018**

Comments: Erosion BMPs:

Other BMPs:

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**

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: 453035 Type: WELL API Number: 073-06733 Status: DG Insp. Status: RI

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 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

Comment:

Corrective Action:

Date: _____

Pits: NO SURFACE INDICATION OF PIT

Type: _____ Lined: NO Pit ID: _____ Lat: _____ Long: _____

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: _____ Liner Condition: _____

Comment: [SEE "COGCC COMMENTS" FOR COMMENT REGARDING DRILLING PIT](#)

Date: 08/27/2018c

Corrective Action

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

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
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 blue 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

<p>PIT COMMENT</p> <p>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.</p>	trujilloam	08/22/2018
<p>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.</p>	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
401741431	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4559390
682503766	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4559389