



Re: enforcement actions for GRYNBERG Hiawatha Deep 4-36 (081-07427)

May 16, 2011: I was requested to pursue enforcement (NOAV) as the operator had spud this well in December 2008 and COGCC had not received Form 5, Form 5A, etc. Violates Rule 308A (Drilling Completion Report) – within 30 days of setting casing (or any wellbore configuration change); Rule 308B (Completed Interval Report), also within 30 days of completion activities.

NOAV sent May 16, 2011 with corrective action deadline of June 15, 2011. The violation date was November 7, 2009. DOC # 200310359. NOAV required (1) complete Form 5 (2) with supplementary information including “as-built” GPS; formation log tops; CBL and/or cement tickets for production casing cement. (3) upload all available digital LAS-formatted logs, also hard copies. (4) Form 5A to document completions. (5) Form 4 if any significant wellbore alterations not permitted (Form 4 #1705757 had casing and cement changes, which were approved, including a DV tool)).

On July 21, 2011, I sent a letter (paralleled by an email) to Gene Webb w/Grynberg. See doc # 2121288. (CC’s to Rob Willis, David Andrews, Stuart Ellsworth). The letter summarized the NOAV and the corrective actions required. I stated that if the corrective action requirements were not met by July 29, 2011, that the COGCC would pursue further enforcement actions. Mr. Webb called July 29 and sent a Form 5. The Form 5 is not complete. I had to fill in much of the casing and cement data. No CBL nor cement data for the production string was submitted. There is cement data for the surface string. However, the GPS data has been received.

On September 1, I participated in the engineering/enforcement teleconference. I was directed to send a summary of this situation. It was sent to Rob Willis, Peter Gowen, Dave Andrews, Kevin King, and Bob Koehler. The summary is basically re-stated in this document.

On September 30 I drafted a letter to be sent to Peter Gowen: “Recommend Pursuit of an A.O.C. & \$1000* Fine”. This was in response to another Engineering-Enforcement teleconference on Sept. 29. I did not send that letter, but emailed Peter (Stuart, Dave Andrews) on Oct. 3.

Also, on Oct. 3, I sent an email to Gene Webb (and Peter, Stuart, and Dave A) giving Grynberg “the opportunity to meet with us in person to discuss why the Abatement Requirements of the NOAV have still not been fully met.”

Gene Webb called me on Oct. 7. He said that he will send in the requested information (via email to me). There would be no Form(s) 5A as there haven’t been any completions. He would send in “additional” formation data. I passed on this information via email later Oct. 7 to Mr. Webb, Peter, Stuart, and Dave A. Though I didn’t give a deadline to Mr. Webb, I believe that I am warranted in

concluding that since I haven't received any of the requested (and promised) information by October 31, I should continue with enhanced and further enforcement action recommendations.

October 28: I provided Peter and Stuart an update on the "pending" AOC (or OFV) for this well. I was instructed to call Gene Webb and, basically, say "provide the requesting (missing) information within one week or I will proceed with enforcement action." Follow this with an email confirmation.

October 31 – as per instruction from Peter Gowen and Stuart Ellsworth, I called Gene Webb (303 850-7490) and gave him the "one week ultimatum." What we (COGCC) required are (1) CBL (preferably) and/or production string cement data; (2) formation tops, as complete as available; (3) deevee (stage) tool information. The Form 5 (and a Sundry) note a deevee tool @ 7800'. Cement amount, exact depth, and calculated (or measured) cement top and bottom were not provided. Mr. Webb said that electronic copies of logs may not be available – I said that hard copies were okay.

Note: there is another NOAV (# 200221962) for this well. The "resolution action" is "approves the request for an OFV ..." I think Rob Willis indicated that this NOAV had been resolved (during teleconference on Sept. 1).

J Krabacher: Oct. 31, 2011.