

April 8, 2014

State of Colorado
Oil and Gas Conservation Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

RE: Form 27: Chivington Pit Remediation

Kris Neidel:

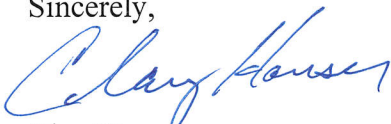
Grynberg Petroleum Company is submitting this Form 27 Site Investigation and Remediation Workplan in response to Document Number 669300751, which outlines the results of an unsatisfactory inspection and determination of mandatory pit closure/remediation of the Chivington Pit. The Chivington Pit is located in the SESE of Section 20, Township 12N, Range 97 West of Moffat County, Colorado.

Grynberg Petroleum is seeking COGCC approval of the attached Form 27 to begin the remediation of the Chivington Pit. Please notify me of your approval via email or letter.

Grynberg Petroleum has contracted Lesair Environmental to lead the soil sampling and remediation effort at the Chivington Pit. The enclosed Form 27 reflects conversations between yourself and Chris DiMarco (Lesair Environmental) regarding how the remediation is to be accomplished. It is anticipated that this Form 27 may be updated as the remediation work commences. Heavy equipment that is to be used in the excavation is currently located at the Chivington Pit; upon COGCC approval of this Form 27, initial excavation of the affected soils will commence within one week of approval.

We look forward to cooperating with you and the COGCC towards a resolution of this matter. If you should have any questions please contact me at (303) 850-7490 or Lesair Environmental at (303) 904-2525.

Sincerely,



Clay Houser
V.P. of Business Development

Enclosures:

cc: Lesair Environmental

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109



#8333

FOR OGCC USE ONLY

RECEIVED
 4/8/2014

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☐ Site/Facility Closure ☒ Other (describe): Pit Closure

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

OGCC Operator Number: 36200	Contact Name and Telephone:
Name of Operator: Grynberg Petroleum Company	Clay Houser
Address: 3600 South Yosemite Street, Suite 900	No: 303-850-7490
City: Denver State: CO Zip: 80237	Fax: 303-850-7498
API Number: 05-081-05709	County: Moffat
Facility Name: Chivington	Facility Number: Loc ID# 312854
Well Name: Chivington	Well Number: #1
Location: (QtrQtr, Sec, Twp, Rng, Meridian): NWSW, 25, T6N, 67W, 6PM	Latitude: 40.4575 Longitude: -104.8473

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Drill cuttings, produced water, oil

Site Conditions: Is location within a sensitive area (according to Rule 901e)? ☐ Y ☒ N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): oil and gas production

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Talamantes loam, 0 to 6% slopes (USDA data)

Potential receptors (water wells within 1/4 mi, surface waters, etc.): Potential seasonal stream located within 1/4 mile

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):	Extent of Impact:	How Determined:
<input checked="" type="checkbox"/> Soils	Local soil contamination confined to pit	COGCC Inspection (Doc #669300751)
<input type="checkbox"/> Vegetation		
<input type="checkbox"/> Groundwater		
<input type="checkbox"/> Surface Water		

REMEDIALTION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

No action until approval of initial Form 27 Remediation Workplan, as per conversations with Kris Neidel (COGCC).

Describe how source is to be removed:

Soils will be carefully excavated and placed within liner and surface-berm containment on-site until a waste soil characterization is completed. Upon receiving the characterization of waste soils, an appropriately permitted disposal facility will be contracted to accept the soils where a manifest system to track the disposal process will be employed.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

Soils will be excavated with heavy equipment using the process described above. After the waste soils are removed, the remaining clean soils will be sampled by collection of five (5) evenly spaced discrete samples, providing a good representation of the pit bottom. These samples will each be analyzed at a laboratory in accordance with table 910-1. Upon receipt of the analysis showing the soils are clean, a meeting will be scheduled with the COGCC to discuss remediation options (as described in the "Reclamation Plan" section of this document).



REMEDIATION WORKPLAN (Cont.)

Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

No groundwater impact is anticipated.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

After laboratory analysis has shown the remaining soils to be within closure limits, results will be submitted and a meeting will be scheduled with the COGCC to discuss analysis results, final closure options and the final reclamation plan. The Form 27 will be updated to reflect the final outcome of those meetings prior to final closure.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? ☐ Y ☐ N If yes, describe:

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____	Date Site Investigation Completed: _____	Date Remediation Plan Submitted: _____
Remediation Start Date: _____	Anticipated Completion Date: _____	Actual Completion Date: _____

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

Print Name: CLAY HANSEN Signed: Clay Hansen
Title: V.P. BUSINESS DEVELOPMENT Date: 4-7-2014

OGCC Approved: Kris Neidel Title: EPS - NW Area Date: 4/11/2014