

**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:

10/24/2017

Submitted Date:

10/24/2017

Document Number:

682402931**FIELD INSPECTION FORM**
 Loc ID 441995 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: _____
Operator Information:OGCC Operator Number: 36200Name of Operator: GRYNBERG* JACK DBA GRYNBERG PETROLEUM COAddress: 3600 S. YOSEMITE ST - STE 900City: DENVER State: CO Zip: 80237-**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**8 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
Andrews, Doug		doug.andrews@state.co.us	
,		r.edelen@grynberg.com	All inspections
,		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
449609	WELL	XX	03/11/2017		123-44404	Grynberg Stateline Federal 24-12-65-4-NH	CI

General Comment:

This is a Construction and Stormwater Inspection in response to Form 42: Notice of construction- Document #401425452. This location is being referred to Enforcement.

Location Construction

Location ID: 441995 CDP: _____

Comment: This location is not in compliance with the approved Form 2A (Document #401005112). Form 2A was permitted for 7.40 acres of disturbance during construction. Field collected data on October 24, 2017 using a Trimble handheld GPS would indicate construction disturbance was exceeded by approximately 1.55 acres, totaling 8.95 acres. This issue is being forwarded onto OGLA staff for further review. Refer to the attached inspection photos for more detail.

Corrective Action: _____ **Date:** _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ **Date:** _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ **Date:** _____

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:

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

Pass

Comment

Appears topsoil was salvaged and stored along the western perimeter of the location.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process

Comment

Per Rule 1002, all stockpiles shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Per Rule 1002, BMPs to prevent weed establishment and to maintain soil microbial activity shall be implemented.

Operator shall consider both short and long-term stabilization BMPs when stabilizing all stockpiles.

At the time of this inspection, there were no observed stabilization BMPs on the topsoil stockpile.

Corrective Action _____

Date _____

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: This location is not in compliance with Reclamation rules. At the time of this inspection, Operator was starting to install straw wattle BMPs along the southeastern location. Per Form 42 Document #401425452 (Notice of construction), construction activities commenced on October 12, 2017. Based on these inspection observations, Operator failed to install stormwater and erosion control BMPs prior to, or at, the start of construction. Straw wattle BMPs are only temporary BMPs and should be used in conjunction with other BMPs. Sediment discharge off location from wind erosion was evident along the northeast, east, and southeast areas of the location. See COGCC comments for additional compliance information regarding stormwater management.

Corrective Action: Operator shall install stormwater and erosion control BMPs prior to, or at, the start of construction; therefore, the corrective action date is based off the Form 42 start of construction date.

Date: 10/12/2017

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
More permanent BMPs should be installed to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation per Rule 1002.f.(2). Operator shall implement BMPs in accordance with good engineering practices per Rule 1002.f.(2).	binschusc	10/24/2017
A follow-up inspection will occur at a future date to ensure the Operator is in compliance with 1000 series Rules.	binschusc	10/24/2017

Attached Documents

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

Document Num	Description	URL
401440085	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4283277
682402932	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4283276