

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402503305

Date Received:  
10/06/2020

FIR RESOLUTION FORM

Overall Status: BOTH

CA Summary:

4 of 4 CAs from the FIR responded to on this Form

3 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10531  
Name of Operator: GRIZZLY OPERATING LLC  
Address: 5847 SAN FELIPE #3000  
City: HOUSTON State: TX Zip: 77057  
Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Mike McKenna</u>		<u>mmckenna@grizzlyenergyllc.com</u>
<u>Arauza, Steven</u>		<u>steven.arauza@state.co.us</u>
<u>Ghan, Scott</u>	<u>970 876-1959</u>	<u>sghan@grizzlyenergyllc.com</u>
<u>-</u>		<u>aaxelson@grizzlyenergyllc.com</u>
<u>Fischer, Alex</u>		<u>alex.fischer@state.co.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 690900120  
Inspection Date: 09/19/2020 FIR Submit Date: 10/02/2020 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: GRIZZLY OPERATING LLC Company Number: 10531  
Address: 5847 SAN FELIPE #3000  
City: HOUSTON State: TX Zip: 77057

LOCATION - Location ID: 323972

Location Name: GIBSON GULCH UNIT-66S91W Number: 29SWSW County: \_\_\_\_\_  
Qtrqtr: SWS Sec: 29 Twp: 6S Range: 91W Meridian: 6  
W  
Latitude: 39.492371 Longitude: -107.585151

FACILITY - API Number: 05-045-00 Facility ID: 323972

Facility Name: GIBSON GULCH UNIT-66S91W Number: 29SWSW  
Qtrqtr: SWS Sec: 29 Twp: 6S Range: 91W Meridian: 6  
W  
Latitude: 39.492371 Longitude: -107.585151

CORRECTIVE ACTIONS:

1 CA# 142491

Corrective Action: Close and seal tank.

Date: 10/05/2020

Response: CA COMPLETED

Date of Completion: 10/05/2020

Operator Comment: The tank was emptied of its contents when it was removed from its permanent location on the facility, as part of the remediation response activities. The tank is temporarily staged in its current location to provide access to the remediation project area. The tank is identified as "out of service", empty, and disconnected from production piping. This is a single well location and the production is shut-in. A cap or plug was installed on the noted 2" inlet pipe on the tank.

COGCC Decision:

COGCC Representative:

**2** CA# 142492

Corrective Action: Move equipment to comply with minimum 75 foot setback as per Rule 605.a.8.

Date: 12/02/2020

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: The noted tank was removed from its permanent location on the facility as part of the remediation response activities. The tank is temporarily staged in its current location to provide access to the remediation project area. The tank is identified as "out of service", empty, and disconnected from production piping. The permanent location of the tank is within the active excavation area. It is our belief that the cited Rule 605.a.8 applies to tanks at the time of installation in their permanent location or when siting tanks when constructing a production facility. The tank will be reinstalled in its original and permanent location when the additional drilling and excavation activities are completed and the remediation project is closed. See COGCC Doc # 402501261 regarding these planned activities. Since the tank is in a temporarily staged location; identified as "out of service"; empty; disconnected from production piping and production is shut-in on location, we would like clarification of the applicability of Rule 605a.8 in this case and any potential safety concerns it poses in its temporary location.

COGCC Decision:

COGCC Representative:

**3** CA# 142493

Corrective Action: Comply with Rule 603.f .

Date: 10/16/2020

Response: CA COMPLETED

Date of Completion: 10/05/2020

Operator Comment: The observed weeds were previously treated with a herbicide treatment, but the remaining weed debris has been removed. This area is within an active excavation associated with remediation project #14050 (incorrect Remediation # noted on inspection report) and additional excavation work is scheduled to occur in October pending COGCC approval of COGCC Doc # 402501261.

COGCC Decision:

COGCC Representative:

**4** CA# 142494

Corrective Action: Comply with Rule 603.f .

Date: 04/15/2020

Response: CA COMPLETED

Date of Completion: 10/02/2020

Operator Comment: See Inspection Doc# 700701147 which is the the COGCC follow-up inspection for the noted inspection report Inspection Doc # 700700253. COGCC staff noted in this inspection that "C/A(s) from previous inspection document # 700700253 have been completed." The stairway is part of the "out of service" tank and is not considered "unused equipment" by the owner of the equipment. The "out of service" equipment (tank and associated stairway) are temporarily staged in a location to create access to the remediation project area and will

be reinstalled in its original and permanent location when the additional drilling and excavation activities are completed and the the remediation project is closed. See pending COGCC Doc # 402501261 regarding these planned activities. A tag has been be added to the tank stairway noting that the stairway is temporarily "out of service" and associated with the identified "out of service" tank. The LOTO tag on the tank identified the tank as "out of service" at the time of the COGCC inspection.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: Please route to Alex Fischer based on our phone conversation regarding the inspection report.

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

Print Name: Scott Ghan

Signed: \_\_\_\_\_

Title: Senior EHS Specialist

Date: 10/6/2020 1:30:45 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

**Document Number**      **Description**

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Total Attach: 0 Files