

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>Fischer, Alex</u>		<u>alex.fischer@state.co.us</u>
<u>Mike McKenna</u>		<u>mmckenna@grizzlyenergyllc.com</u>
<u>.</u>		<u>aaxelson@grizzlyenergyllc.com</u>
<u>Arauzo, Steven</u>		<u>steven.arauza@state.co.us</u>
<u>Ghan, Scott</u>	<u>970 876-1959</u>	<u>sghan@grizzlyenergyllc.com</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: _____
Qtrqr: 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
Qtrqr: SWS Sec: 29 Twp: 6S Range: 91W Meridian: 6
W
Latitude: 39.492371 Longitude: -107.585151

CORRECTIVE ACTIIONS:

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: Approved pending re-inspection

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 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: Approved pending re-inspection

COGCC Representative: The inspector does not agree with Grizzly "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." Operators have had to SI facilities when they have placed temporary tanks less than 75' from a wellhead and move the tank the proper distance per Rule 605.a.(8).

COGCC Supervisor: Part of the reason for the 605.a.(8) separation distance is to maintain safe access to the wellhead in the event emergency access is needed. Therefore, this tank location does not conform with the siting. At this time, the operator is not using the tank, and has reported it to be "identified as 'out of service'" and "disconnected from production piping." Therefore during active remediation, it is appropriate to leave the tank as it is. If the remediation project will be suspended for any length of time, it would be appropriate to request a variance or move the tank to fully comply. If the remediation project is timely completed and the tank returned to its rightful location, then the tank may remain as placed temporarily. This Factual Review Request is therefore conditionally approved pending reinspection following timely completion of the remediation project (i.e. consistent with original CA date).

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 in scheduled to occur in October pending COGCC approval of COGCC Doc # 402501261.

COGCC Decision: Approved pending re-inspection

COGCC Representative: F27 Doc #402501261 was approved on 10/6/2020.

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 stariway) 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: Approved

COGCC Representative: As noted in Inspection Doc # 700701147, C/A(s) from previous inspection document # 700700253 have been completed. Equipment on location i.e. Tank and stairs are going to be reinstalled according to operator.

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.

<u>Document Number</u>	<u>Description</u>
402503305	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files