

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401743302
Date Received:
08/24/2018

FIR RESOLUTION FORM

CA Summary:

11 of 11 CAs from the FIR responded to on this Form

11 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 35080
Name of Operator: GRAND MESA OPERATING CO
Address: 1700 N. WATERFRONT PKWY BL 600
City: WICHITA State: KS Zip: 67206
Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
Michael Reilly	316-265-3000	mreilly@gmocks.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 682503765
Inspection Date: 08/21/2018 FIR Submit Date: 08/22/2018 FIR Status: _____

Inspected Operator Information:

Company Name: GRAND MESA OPERATING CO Company Number: 35080
Address: 1700 N. WATERFRONT PKWY BL 600
City: WICHITA State: KS Zip: 67206

LOCATION - Location ID: 453036

Location Name: YOSEMITE Number: 1-3 County: _____
Qtrqtr: SESE Sec: 3 Twp: 8S Range: 55W Meridian: 6
Latitude: 39.377160 Longitude: -103.531420

FACILITY - API Number: 05-073-00 Facility ID: 453036

Facility Name: YOSEMITE Number: 1-3
Qtrqtr: SESE Sec: 3 Twp: 8S Range: 55W Meridian: 6
Latitude: 39.377160 Longitude: -103.531420

CORRECTIVE ACTIONS:

1 CA# 118112

Corrective Action: Minimize off-location disturbances in accordance to Rule 1002.e(4). Conduct maintenance on access road and implement BMPs as needed to facilitate travel. Date: 08/21/2018

Response: CA COMPLETED Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: Not Approved

COGCC Decision "Not Approved". Corrective actions required operator to minimize off-location disturban.

COGCC Representative: conduct maintenance on access road and implement BMPs as needed. Operator comments in the attached document indicate "no changes" have occurred. Corrective action remains applicable.

Operator will be required to minimize disturbances while conducting final reclamation. Continued use and any additional disturbances will need to be reclaimed.

2 ☒ CA# 118113

Corrective Action: Install labeling to comply with Rule 210.d.

Date: 08/23/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. Documents provided state barrels have been removed. Photo documentation provided is unclear. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards.

3 ☒ CA# 118114

Corrective Action: Provide immediate notice via FIRR when equipment has been removed from areas beyond the permitted disturbance area. Any additional disturbances will require reclamation in accordance to COGCC 1000 series rules. The corrective action date will be based on the Form 42, document 401710401, construction start date, 7/25/2018.

Date: 07/25/2018

Response: CA COMPLETED

Date of Completion: 08/24/2018

Operator Comment: Action completed see attached information

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards. Photos and documentation that have been provided is unclear and insufficient.

4 ☒ CA# 118115

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f

Date: 07/25/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards. Based on the photos provided, it is unclear if BMPs have been installed in accordance with good engineering practices.

Within documents provided by operator, comments state "Installed requested berms and compacted in accordance with good engineering practices". Note BMPs on location were selected and installed by the operator. COGCC staff did not prescribe or request specific stormwater and sediment control BMPs to be installed on location. Staff only documented that BMPs were missing or insufficient/inadequate, and required operator to install BMPs per Rule 1002.f in accordance with good engineering practices.

5 ☒ CA# 118116

Corrective Action: Install stormwater and erosion control BMPs in accordance with good engineering practices per 1002.f and COAs

Date: 07/25/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Action completed see attached information

Operator
Comment:

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards. Based on the photos provided, it is unclear if BMPs have been installed in accordance with good engineering practices.

Within documents provided by operator, comments state "Installed requested berms and compacted in accordance with good engineering practices". Note BMPs on location were selected and installed by the operator. COGCC staff did not prescribe or request specific stormwater and sediment control BMPs to be installed on location. Staff only documented that BMPs were missing or insufficient/inadequate, and required operator to install BMPs per Rule 1002.f in accordance with good engineering practices.

6  CA# 118117

Corrective Action: Remove ponding chemicals from the pad. Contaminated soils will required cleaning/remediation or removal. Provide us with information identifying fluid constituents ponding on the pad.

Date: 08/27/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: **Not Approved**

COGCC Representative: Operator comments identify fluids as "Rainwater". This is incorrect, photo documentation from previous inspections show fluids were a result of drilling operations. Additionally there was no evidence of ponding water due to rain events anywhere else on pad, within stormwater BMPs, or the ponds within the drainages to the west and north of pad.

Corrective action remains applicable.

7  CA# 118118

Corrective Action: Immediately store barrels/containers within secondary containment or remove and properly store or dispose. Any contamination to the soil surface will need to be cleaned/remediated. Operator will also be required to provide MSDS sheets for the barrels, including a manifest of where barrels were taken to if removed/disposed, and a manifest of any contaminated soils that were cleaned up. Submit records via form 4.

Date: 08/21/2018


Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: **Not Approved**

COGCC Representative: Operator indicate in the attached document that barrels have been removed and soils disposed of. Operator has also included MSDS sheets, however, operator has not provided a manifest of where barrels/soils were disposed to.

8  CA# 118119

Corrective Action: Immediately cease and desist sewage discharge from sanitary facilities. Immediately remove and properly dispose sewage from location. Soils will require removal and proper disposal, or cleaning/remediation. A corrective action date of 8/6/2018 is being provided as this is the SPUD date.

Date: 08/06/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. Operator has provided a waste manifest stating sewage (134 pounds) was "placed in ziplock bags and a 5 gallon bucket for transfer into the on-site sewage tank for removal from location".

9  CA# 118120

Corrective Action: Provide total cubic yards of topsoil salvaged and stored on this location.

Date: 08/24/2018

Response: CA COMPLETED

Date of Completion: 08/24/2018

Operator Comment: Working on getting this information from Halde will forward as soon as we get the cubic feet stored

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved". Submission of a resolution response "Corrective Action Complete" is a notice to the COGCC that the corrective action has been addressed in its entirety. Operator comments indicate they are still working on this information. No documents have been provided.

10  CA# 118121

Corrective Action: Separate, store and identify topsoil in accordance to COGCC 1000 series rules. A corrective action date of 7/25/2018 is being used based on the Form 42, document 401710401, notice of construction.

Date: 07/25/2018

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: **Not Approved**

COGCC Representative: Comments in attached documents identified that "Topsoil is saved on top and back of berm as to restore location with quality topsoil". Photos and documentation that have been provided identifying salvaged soils are unclear and insufficient.

11  CA# 118122

Corrective Action: Provide chemical inventory, in a readily reviewable/accessible format (such as a PDF file, excel, etc....) of any chemical products brought to the well site for use downhole during drilling by 8/27/2018

Date: 08/27/2018

Based on the review of the inventory, additional testing may be required for drilling pit closure.

Response: CA COMPLETED

Date of Completion: 08/22/2018

Operator Comment: Action completed see attached information

COGCC Decision: **Not Approved**

COGCC Representative: COGCC required operator to provide chemical inventory of any chemical products brought to the well site for use downhole during drilling by 8/27/2018. Inspection date 8/21/2018.

Operator has submitted MSDS reports, however no chemical inventory has been provided. During phone meeting with operator on 8/30/2018, operator indicated inventory will be submitted within the next week.

OPERATOR COMMENT AND SUBMITTAL

Comment:

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

Print Name: Michael J. Reilly

Signed: _____

Title: President

Date: 8/24/2018 10:54:08 AM

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>
401743302	FIR RESOLUTION SUBMITTED
401743317	Waste Manifest Yosemite 1-3
401743318	Corrective actions taken Yosemite 1-3
401743321	MSDS Sheets for Yosemite 1-3 site
401743406	Corrective Pictures taken after cleanup

Total Attach: 5 Files