

**FORM
INSP**Rev
X/20**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:

05/17/2023

Submitted Date:

05/23/2023

Document Number:

702801537

FIELD INSPECTION FORMLoc ID 418843 Inspector Name: O'Malley, Anna On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10524

Name of Operator: GRMR OIL & GAS LLC

Address: P.O. BOX 6280

City: BROOMFIELD State: CO Zip: 80021

Status Summary:

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

8 Number of Comments

4 Number of Corrective Actions

☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
William Fustos		bfustos@emslp.com	All Inspections
Adesoye, Yosoye	404-723-6547	yosoye@grmroilandgas.com	
Chaps, Alain	443-531-8262	alainchaps@gmail.com	
Chad Collins		collins.chad@grmroilandgas.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
418833	WELL	PA	07/27/2016	OW	081-07620	DURHAM 2-31	RI
418843	LOCATION	AL			-	Durham 1-31, 2-31	RI
418856	WELL	PA	07/22/2016	OW	081-07622	DURHAM 1-31	RI
447088	WELL	AL	05/22/2019	LO	081-07828	Peppy 31-15	RI
447933	WELL	AL	05/22/2019	LO	081-07831	Old Sorrel Federal 31-15	RI

General Comment:

On 5/17/2023, Reclamation Specialist O'Malley conducted a final reclamation and stormwater inspection at GRMR OIL & GAS LLC's Durham/1-31, 2-31 Location #418843 in Moffat County, Colorado.

The following compliance issues were observed during this inspection:

- Noxious weeds
- Equipment present
- Reclamation not performed
- Stormwater: slopes unstable

Refer to the "Location," "Reclamation," "Stormwater" and "COGCC Comments" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	DEBRIS		
Comment:	It was observed in this inspection that final reclamation has not been performed per 1004 Rules: - 1004.a: Equipment/debris (concrete slab, electric equipment, cattle guard) associated with the location remains. All equipment, including power lines which previously serviced the location must be removed. Per Rule 1004.a all equipment and debris was required to be removed within three (3) months of plugging the well.		
Corrective Action:	Comply with Rule 1004.a. Remove all equipment and debris from the location, access road and surrounding/adjacent areas.	Date:	07/22/2023
Type	WEEDS		
Comment:	Noxious weeds (musk, bull and Canada thistle, houndstongue, cheatgrass) are widespread and common throughout the location. Annual, undesirable plant species/weeds (Russian thistle) are also widespread and are densely colonizing the site.		
Corrective Action:	Comply with Rule 1004.e. Conduct weed management to prevent further establishment and spread of noxious weeds and undesirable plant species; ongoing weed management required until location passes final reclamation.	Date:	06/01/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities				
Facility ID: <u>418833</u>	Type: <u>WELL</u>	API Number: <u>081-07620</u>	Status: <u>PA</u>	Insp. Status: <u>RI</u>
Facility ID: <u>418843</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>418856</u>	Type: <u>WELL</u>	API Number: <u>081-07622</u>	Status: <u>PA</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447088</u>	Type: <u>WELL</u>	API Number: <u>081-07828</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>
Facility ID: <u>447933</u>	Type: <u>WELL</u>	API Number: <u>081-07831</u>	Status: <u>AL</u>	Insp. Status: <u>RI</u>

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____

Date Interim Reclamation Completed: _____

Land Use: DRY LAND, RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

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: DRY LAND, RANGELAND _____

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed **Fail** No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control **Fail**

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment:

<p>Noxious weeds and undesirable plant species are widespread. Equipment/debris remains. Refer to the "Location" section of this report for corrective action.</p> <p>It was observed in this inspection that final reclamation has not been performed per 1004 Rules: - Reclamation, including but not limited to gravel removal, compaction alleviation, recontouring/regrading, restoration, and revegetation has not been performed. Location is large, with large cut and fill slopes which are unvegetated and a large pad surface colonized by weeds.</p>		Date 11/15/2023
Corrective Action:	<p>Complete final reclamation activities pursuant to 1004 Rules including, but not limited to, gravel removal, compaction alleviation (cross ripping to a minimum depth of 18 inches), recontouring/regrading, replacement of topsoil, and revegetation activities on the location and access road. Use a seed mixture provided by the surface owner, or a mixture prescribed by the local soil conservation district. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. Revegetation activities shall be completed no later than 11/15/2023.</p>	
Overall Final Reclamation Fail Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: Location has not been reclaimed or recontoured. Large, unvegetated, unstabilized cut and fill slopes are present. Evidence of erosion/lack of stabilization (rills) observed throughout slopes. This location cannot receive a passing final reclamation inspection until the site (including cut/fill slopes) achieves permanent stabilization (even if a variance is approved).</p> <p>Corrective Action: Install or repair required BMPs per Rule 1002.f in conjunction with reclamation activities at the site. Maintain BMPs for stabilization of location until uniform, stabilizing vegetation is established across all disturbance areas.</p> <p>Date: 11/15/2023</p>						
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments

Comment	User	Date
Operator submitted Form 4 Rule 502 variance request (document #402517651) on 10/23/2020. The request was not approved or denied by COGCC. Per the 1/15/2021 rule change, variances are no longer able to be submitted with a Form 4 Sundry. If a variance is planned, the variance request must be resubmitted via hearings application to the commission per Rules 502 and 510.	omalleya	05/23/2023

Attached Documents

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

Document Num	Description	URL
403411329	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6123731
702801538	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6123725