

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
401733683
Date Received:
08/14/2018

FIR RESOLUTION FORM

CA Summary:
2 of 2 CAs from the FIR responded to on this Form
0 CA Completed
2 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 77330
Name of Operator: SG INTERESTS I LTD
Address: 100 WAUGH DR SUITE 400
City: HOUSTON State: TX Zip: 77007
Contact Name and Telephone:
Name:
Phone: () Fax: ()
Email:

Additional Operator Contact:

Contact Name	Phone	Email
Conklin, Curtis		inspection@sginterests.com curtis.conklin@state.co.us

COGCC INSPECTION SUMMARY:

FIR Document Number: 680602895
Inspection Date: 07/25/2018 FIR Submit Date: 08/14/2018 FIR Status:

Inspected Operator Information:

Company Name: SG INTERESTS I LTD Company Number: 77330
Address: 100 WAUGH DR SUITE 400
City: HOUSTON State: TX Zip: 77007

LOCATION - Location ID: 440803

Location Name: Falcon Seaboard 11-90-12 Number: 3 County: GUNNISON
Qtrqtr: NESW Sec: 12 Twp: 11S Range: 90W Meridian: 6
Latitude: 39.112350 Longitude: -107.399280

FACILITY - API Number: 05-051-00 Facility ID: 438645

Facility Name: Falcon Seaboard 11-90-12 Number: 3
Qtrqtr: NESW Sec: 12 Twp: 11S Range: 90W Meridian: 6
Latitude: 39.112350 Longitude: -107.399280

CORRECTIVE ACTIONS:

1 CA# 117872

Corrective Action: Remove to comply with Rule 603.f. Corrective action date will remain to document time since original corrective action date. Date: 12/10/2017

Response: FACTUAL REVIEW REQUEST

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

Operator Comment: This CA to remove oily rags and other trash on the 12/5/17 (685200414) inspection report was completed by the 12/10/17 deadline. Follow-up COGCC inspection photos show this was completed. The 12/10/17 CA date was used again on the 3/21/18 (689401070) inspection for a ladder and other unused equipment; it too was removed

upon completion of tasks where this equipment was no longer needed. This is also shown in COGCC inspection photos. Now this 12/10/17 CA date is being used again, but this time for lining that is coming up from under the well pad on the 680602895 report from 8/14/18. This lining comes up as part of a freeze/thaw process, and as the environment settles. It is removed as it comes up. This new lining showing should not have the same 12/10/17 CA date as the two previous CA's. Please revise this new CA deadline. Please also close out the 12/10/17 CA date as being completed.

COGCC Decision: **Not Approved**

COGCC Representative: Corrective action date documented on the inspection as well as the corrective action will remain as it is clear that the location was out of compliance. The 2017 corrective action date is used to document the persistent failure of the operator to address ongoing housekeeping issues on this location. It is expected that locations will be in compliance at all times. Further, this request is outside of the guidelines provided for Field Inspection Report Resolution (FIRR) review, as interpretation issues are not allowed. Please refer to the online guidance for the FIRR, posted on the COGCC website to understand what can be considered with this process.

COGCC Supervisor: Corrective action date documented on the inspection as well as the corrective action will remain as it is clear that the location was out of compliance. The 2017 corrective action date is used to document the persistent failure of the operator to address ongoing housekeeping issues on this location. It is expected that locations will be in compliance at all times. Further, this request is outside of the guidelines provided for Field Inspection Report Resolution (FIRR) review, as interpretation issues are not allowed. Please refer to the online guidance for the FIRR, posted on the COGCC website to understand what can be considered with this process.

2  CA# 117873

Corrective Action: Remove unused equipment. Corrective action date will remain to document time since original corrective action date. Date: 06/22/2018

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: The pipe fittings and other unused equipment discussed in the 680602895 report, as well as the tubing, and tubing rack discussed in the 689401070 inspections are not unused equipment. This equipment is part of the Falcon Seaboard 11-90-12 #5 well head. The production tubing needs to be run when the well is ready and the other equipment is also needed when the tubing is run. Please remove this as being a corrective action.

COGCC Decision: **Not Approved**

COGCC Representative: Corrective action date documented on the inspection as well as the corrective action will remain as it is clear that the equipment referred to in the inspection is not in use. This factual review request is outside of the guidelines provided for the Field Inspection Report Resolution (FIRR) review, as interpretation issues are not allowed. Further, no documentation is provided to satisfy the request.

COGCC Supervisor: Corrective action date documented on the inspection as well as the corrective action will remain as it is clear that the equipment referred to in the inspection is not in use. This factual review request is outside of the guidelines provided for the Field Inspection Report Resolution (FIRR) review, as interpretation issues are not allowed. Further, no documentation is provided to satisfy the request.

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: Amanda Blanchard

Signed: _____

Title: Env & Reg Manager

Date: 8/14/2018 4:48:40 PM

ATTACHMENT LIST

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

Document Number **Description**

401733683	FIR RESOLUTION SUBMITTED
-----------	--------------------------

Total Attach: 1 Files