

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:  
402047969  
Date Received:  
05/17/2019

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

3 of 9 CAs from the FIR responded to on this Form

0 CA Completed  
3 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 83130  
Name of Operator: STRACHAN EXPLORATION INC  
Address: 383 INVERNESS PKWY, STE 360  
City: ENGLEWOOD State: CO Zip: 80112

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Stephen M Strachan</u>	<u>303-790-9115</u>	<u>sms@strachanexploration.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 689900683  
Inspection Date: 05/15/2019 FIR Submit Date: 05/16/2019 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: STRACHAN EXPLORATION INC Company Number: 83130  
Address: 383 INVERNESS PKWY, STE 360  
City: ENGLEWOOD State: CO Zip: 80112

LOCATION - Location ID: 324831

Location Name: FRAZEE-619S50W Number: 6NWNW County: KIOWA  
Qtrqr: NWN Sec: 6 Twp: 19S Range: 50W Meridian: 6  
W  
Latitude: 38.438830 Longitude: -103.060030

FACILITY - API Number: 05-061-00 Facility ID: 213004

Facility Name: FRAZEE Number: 2-6  
Qtrqr: NWN Sec: 6 Twp: 19S Range: 50W Meridian: 6  
W  
Latitude: 38.438830 Longitude: -103.060030

CORRECTIVE ACTIIONS:

2 CA# 125237

Corrective Action: Properly treat or dispose of oily waste in accordance with Rule 907.e.. Contact area COGCC EPS Date: 05/20/2019

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: We are in receipt of the inspection as of 5/16/19, Thursday evening, with a compliance date set at 5/20/19, Monday. The soil staining shown in Photo #6, well head and pump, appears to be localized spotting of oily waste; the spotting in Photo #9, in a storage shed, is of unknown origin and may be related to recent rains. We believe

this staining at the well head, pump and shed should be allowed a 30-day cleanup period as they are localized, which would allow for contractor engagement and sufficient time to work the clean up. As today is Friday May 17, with the weekend approaching, finding contractors and arranging for cleanup and disposal by Monday, an unreasonable request. 30 days will allow for a diligent and prudent approach to clean up and disposal.

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

COGCC  
Representative:

**3** CA# 125238

Corrective Action: Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 907A. Contact COGCC EPS staff.

Date: 05/20/2019

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: We are in receipt of the inspection 5/16/19, Thursday evening, with a compliance date of Monday 5/20/19. With this being Friday afternoon, and a compliance date of Monday, we do not have the time or the opportunity to hire contractors to test, sort, build a containment location, if necessary, and dispose of unknown liquids with the submitted time frame. For localized instances, such as these, a 30-day time frame is more appropriate to be able to identify, evaluate, determine materials and arrange for disposal.

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

COGCC  
Representative:

**4** CA# 125239

Corrective Action: E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 907. Contact COGCC EPS staff.

Date: 05/20/2019

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: We are in receipt of the inspection 5/16/19, Thursday evening, with a compliance date set at 5/20/19, Monday. With today being Friday, we do not have the time available to hire contractors, testers and arrange for disposal by Monday 5/20/19. We believe the stained soils around the wellhead, pumpjack and shed are localized spotting that can be cleaned and resolved within a 30-day window. If testing of soils or other waste is required, we would need 30 days to contract for testing and disposal. Attempting a cleanup over a weekend is not possible without adequate contractor lead time.

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

COGCC  
Representative:

#### OPERATOR COMMENT AND SUBMITTAL

Comment: We are in receipt of the inspection 5/16/19, Thursday evening, with a compliance date set at Monday 5/20/19. We are filing this 30-day request as we believe the staining associated with the well head, pump and shed are localized; the stored E&P waste needs to be properly identified for disposal; and arranging for contractors, testers and disposal of items cannot be accomplished over the weekend in a diligent and prudent manner.

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

Print Name: Stephen M. Strachan

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

Title: President

Date: 5/17/2019 3:34:26 PM

### ATTACHMENT LIST

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

**Document Number**    **Description**

<b><u>Document Number</u></b>	<b><u>Description</u></b>

Total Attach: 0 Files