

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:

402113749

Date Received:

07/18/2019

## FIR RESOLUTION FORM

### CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 CA Completed  
0 Factual Review Request

### OPERATOR INFORMATION

OGCC Operator Number: 10657

Name of Operator: PCR OPERATING LLC

Address: 4040 BROADWAY STREET #510

City: SAN ANTONIO State: TX Zip: 78209

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) Fax: ( )

Email: \_\_\_\_\_

### Additional Operator Contact:

Contact Name

Phone

Email

David Kunovic

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Arthur, Denise

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### COGCC INSPECTION SUMMARY:

FIR Document Number: 696200383

Inspection Date: 07/10/2019

FIR Submit Date: 07/11/2019

FIR Status: \_\_\_\_\_

### Inspected Operator Information:

Company Name: BLACK RAVEN ENERGY INC

Company Number: 10203

Address: 165 S UNION BLVD SUITE 410

City: LAKEWOOD State: CO Zip: 80228

### LOCATION - Location ID: 313755

Location Name: DAVIS, R Y-61N57W Number: 6SWNE County: \_\_\_\_\_

Qtrqr: SWNE Sec: 6 Twp: 1N Range: 57W Meridian: 6

Latitude: 40.082713 Longitude: -103.800849

### FACILITY - API Number: 05-087- -00 Facility ID: 313755

Facility Name: DAVIS, R Y-61N57W Number: 6SWNE

Qtrqr: SWNE Sec: 6 Twp: 1N Range: 57W Meridian: 6

Latitude: 40.082713 Longitude: -103.800849

### CORRECTIVE ACTIONS:

1 CA# 126929

Corrective Action:

Date: 05/31/2017

Perform reclamation in accordance to COGCC 1000 series reclamation requirements including, but not limited to, compaction alleviation, recontour/regrading and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of predisturbance or reference area levels on the access road and location. Use a seed mixture requested by the landowner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed.

Response: CA COMPLETED

Date of Completion: 09/03/2018

Operator Comment: The well location and access road are in a very sandy, blow sand area, that in part are remnants of the "dust-bowl" era. The surface owner is very insistent that PCR leave the area as is. The surface owner believes that any further reclamation activity would end making things worse. The roads in this area are used by both PCR and the Glenn Cattle company - it not necessary to do any recontouring or additional reclamation. Surface owner letter attached.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC decision "Not Approved".

An Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments corrective action does not appear to have been completed.

The location and access road are observed as industrial oil and gas disturbance subject to COGCC 1004 final reclamation obligations of PCR Operating LLC.

A surface owner letter alone does not waive operator responsibility to comply with COGCC regulations; It is noted that the COGCC has provided Operator several notices regarding the requirement for submission and Director approval of a 502.b surface owner variance request, in accordance with the "1001.c: Reclamation Variances and Waivers" Operator Guidance document, to waive compliance to various requirements of COGCC 1000 series reclamation rules.

In summary, no 502.b surface owner variance has been submitted or approved for this location; PCR Operating remains responsible for the reclamation of their oil and gas disturbance(s) in accordance with 1000 series rules, and the corrective action requiring final reclamation will remain applicable until addressed.

#### OPERATOR COMMENT AND SUBMITTAL

Comment: The well location and access road are in a very sandy, blow sand area, that in part are remnants of the "dust-bowl" era. The surface owner is very insistent that PCR leave the area as is. The surface owner believes that any further reclamation activity would end making things worse. The roads in this area are used by both PCR and the Glenn Cattle company - it not necessary to do any recontouring or additional reclamation. Surface owner letter attached.

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

Print Name: David Kunovic

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

Title: VP Exploration

Date: 7/18/2019 11:16:15 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>
402113749	FIR RESOLUTION SUBMITTED
402113832	Surface ownwer letter

Total Attach: 2 Files