

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:
402209006

Date Received:
10/14/2019

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

5 of 5 CAs from the FIR responded to on this Form

5 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10351

Name of Operator: WAPITI OPERATING LLC

Address: 1310 W SAM HOUSTON PKWY N

City: HOUSTON State: TX Zip: 77043

Contact Name and Telephone:

Name:

Phone: () Fax: ()

Email:

Additional Operator Contact:

Contact Name	Phone	Email
Randy Madison	575-445-6706	rmadison@wapitienergy.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 689901291

Inspection Date: 09/23/2019

FIR Submit Date: 09/24/2019

FIR Status:

Inspected Operator Information:

Company Name: ARP PRODUCTION COMPANY LLC

Company Number: 10471

Address: 425 HOUSTON STREET SUITE 300

City: FORTH WORTH State: TX Zip: 76102

LOCATION - Location ID: 309087

Location Name: VPR C-635S66W Number: 6SENW County: LAS ANIMAS

Qtrqtr: SENW Sec: 6 Twp: 35S Range: 66W Meridian: 6

Latitude: 37.030110 Longitude: -104.824730

FACILITY - API Number: 05-071-00 Facility ID: 287870

Facility Name: VPR C Number: 142

Qtrqtr: SENW Sec: 6 Twp: 35S Range: 66W Meridian: 6

Latitude: 37.030110 Longitude: -104.824730

CORRECTIVE ACTIONS:

1 CA# 131034

Corrective Action: Comply with Rule 1003.f.
Control noxious weeds.

Date: 07/10/2019

Response: CA COMPLETED

Date of Completion: 10/07/2019

Operator Comment: Noxious weeds on the pad and the lease road leading to the pad were cut, bagged and disposed of. Any weeds that had flowers or were head out were removed. Any recent growth and green weeds have froze. The weeds inside the main gate do not belong to Wapiti Operating they belong to the landowner Vermejo Park Ranch. See attached photo of the pick-up. My pickup is 20 feet long from bumper to bumper. Add two feet to each end of my pickup and you can see what is included in the 24 ft. easement we have with the land owner. The land owner runs a hunting lodge (Cabin see in the back ground). Wapiti has not disturbed any soil in that area for 15 years.

COGCC Decision: **Not Approved**

COGCC Representative: Photos do not clearly show weed treatment.
Operator must perform noxious weed control on all disturbed areas.
Follow up inspection will be performed.

2 CA# 131035

Corrective Action: Comply with Rule 1003.f.

Date: 08/01/2019

Response: CA COMPLETED

Date of Completion: 08/20/2019

Operator Comment: I reached out to Bob Lucero weed inspector for Las Animas county as per your recommendation . He recommend using Southeast Colorado Environmental Services. LLC a professional weed applicator in Las Animas county. Mr. Hamilton is very qualified to create and submit a weed plan in the state of CO. He has sprayed the weeds and manged the weeds on Timber Creek (Previously XTO) and Evergreen (Previously Pioneer). I previously submitted a weed plan implemented and managed by the land ower. His people are professional environmentalist. If for some reason you do not approve this plan, I will be looking for very specific reasons why not and how to bring it into COGCC compliance as Rule 1033.f. contains 5 sentences none containing what you want specific in the plan. I forward previous e-mails to Mr. Hamilton so he was sure to address your concerns.

COGCC Decision: Approved pending re-inspection

COGCC Representative: The second submitted weed plan appears to provide mostly non-pertinent information regarding Wapiti's ongoing weed control. It is unlikely that performing weed control once annually will be sufficient.
As a condition of approval of the weed control plan, Wapiti must: 1. Monitor and conduct weed control throughout the growing season.
2. Perform noxious weed control in the early Summer and Fall as recommended by the contractor in the weed control plan.
3. Perform Integrated Weed Management such as but not limited to physical, cultural, and chemical control.
Ongoing inspections will be performed to evaluate compliance of Rule 1003.f.

3 CA# 131036

Corrective Action: Comply with 1003.a.
Remove debris.

Date: 10/05/2019

Response: CA COMPLETED

Date of Completion: 09/23/2019

Operator Comment: The netting that was holding the stabilization materials in place that blew up into a pile have been removed along with any other visible netting on the location.

COGCC Decision: Approved pending re-inspection

COGCC Representative:

4 CA# 131037

Corrective Action: Comply with the 1003 interim reclamation rules.
Stabilize the cut slope.

Date: 07/17/2019

Response: CA COMPLETED

Date of Completion: 10/14/2019

Operator Comment: Additional wattles have been placed on the slope. Note the Elk have tore them up already we will restake them. Reclamation professional has been consulted on this site. He feels it will take 2 to 3 years to completely stabilize this hill side. This is an ongoing project. More rock checks are being installed along the 1st self of the reclamation. The rock checks along the road will be cleaned and refreshed.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Stormwater controls must be installed in accordance with good engineering practice.
Cut slope must be stabilized to prevent erosion. The seeded area must be stabilized until vegetation establishes.

5 CA# 131038

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: 07/17/2019

Response: CA COMPLETED

Date of Completion: 10/14/2019

Operator
Comment:

Additional Rock checks are being installed and the wash rocked were the water exits the self on the north end.

COGCC Decision: **Not Approved**

COGCC
Representative:

Not clear if corrective action was completed.

OPERATOR COMMENT AND SUBMITTAL

Comment: The C-142 continues to be an ongoing project. We will continue to stabilize the sipoil per the reclamation specialists recommendations. We will reseed again in the spring of 2020 and spray weeds per the weed control plan submitted.

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

Print Name: Randy Madison

Signed: _____

Title: HSE Specialist

Date: 10/14/2019 3:35:44 PM

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>
402209006	FIR RESOLUTION SUBMITTED
402209123	Netting Removed C-142 Photo 1
402209128	Weed Remediation C-142 Photo 2
402209136	Weed Remediation C-142 Photo 3
402209140	Easement Photo Pick-up 1
402209145	Easement Photo Pick-up 2

Total Attach: 6 Files