

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402127021

Date Received:

07/31/2019

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

2 of 2 CAs from the FIR responded to on this Form

2 CA Completed
0 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

inspection@sginterests.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 693900458

Inspection Date: 06/18/2019

FIR Submit Date: 07/09/2019

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: 428197

Location Name: Eck 12-90-1 Number: 428197 County: GUNNISON

Qtrqr: Lot 1 Sec: 1 Twp: 12S Range: 90W Meridian: 6

Latitude: 39.048110 Longitude: -107.390480

FACILITY - API Number: 05-051- -00 Facility ID: 431411

Facility Name: Eck WDW Number: 2

Qtrqr: Lot 1 Sec: 1 Twp: 12S Range: 90W Meridian: 6

Latitude: 39.048110 Longitude: -107.390480

CORRECTIVE ACTIONS:

1 ☒ CA# 126836

Corrective Action: Remove and properly store unused equipment and debris.

Date: 08/05/2019

Response: CA COMPLETED

Date of Completion: 07/11/2019

Operator Comment: Equipment necessary for downhole maintenance activities this spring has been removed. See attached photos.

COGCC Decision: Approved pending re-inspection

COGCC
Representative: _____

2  CA# 126837

Corrective Action: Stormwater controls need to be installed to stabilize erosion along the well pad, access road ditches, and bare soils downslope from the road. Culverts need to be repaired/replaced as needed. Erosional blanket on well pad cut-slopes needs to be repaired or replaced. Stormwater controls need to be installed using good engineering practices such as those described in CDOT stormwater and erosion manuals. This is the second corrective action for stormwater erosion at this location.

Date: 07/22/2019

Response: CA COMPLETED

Date of Completion: 07/17/2019

Operator Comment: It should be noted that this area received over 200% of normal snowfall and as a result, spring runoff was intense and tested all stormwater control measures. With this impact, a lot of maintenance is necessary, however it does not necessarily mean control measures failed. Most control measures simply acted as designed. There was no sediment discharge from the location. The slope stabilization blanket installed in 2017 suggested by COGCC worked as designed - it is now decomposing after 18 months. The blanket allowed the seed to grow and stabilize the slope; vegetation is continuing to grow as the blankets decompose. The minimal amount of sediment collected in the diversion ditch also shows the blankets worked. However, the cut slopes are scheduled for seeding and hydromulch as well to try and speed up the reclamation efforts to avoid COGCC miss interpretation of SG's stormwater management efforts. As far as the access road, the large amount of snowmelt did have some sediment loading into the ditch and culverts. This ditch has been maintained, as it normally is two times a year. The landowner grazes sheep very heavily on his land and as a result the vegetation growth is slow, however it continues to progress. Vegetation plots show this area is achieving approximately 10% growth every year.

COGCC Decision: **Not Approved**

COGCC Representative: Photos and operator comment do not demonstrate that corrective action is sufficiently addressed. Compliance will be determined during a followup inspection.

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: 7/31/2019 11:45:21 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>
402127021	FIR RESOLUTION SUBMITTED
402127054	CA Photos

Total Attach: 2 Files