

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

403388698

Date Received:

04/29/2023

FIR RESOLUTION FORM

Overall Status:

CA Summary:

7 of 7 CAs from the FIR responded to on this Form

6 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10690

Name of Operator: IMPETRO RESOURCES LLC

Address: 558 CASTLE PINES PKWY UNIT B-4

City: CASTLE PINES State: CO Zip: 80108

Contact Name and Telephone:

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

Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

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

Additional Operator Contact:

Contact Name

Phone

Email

Bongers, Brent

3619355633

bbongers@impetroresources.com

Heibel, Krystal

krystal.heibel@state.co.us

COGCC INSPECTION SUMMARY:

FIR Document Number: 708200181

Inspection Date: 04/20/2023

FIR Submit Date: 04/28/2023

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

Inspected Operator Information:

Company Name: IMPETRO RESOURCES LLC

Company Number: 10690

Address: 558 CASTLE PINES PKWY UNIT B-4

City: CASTLE PINES State: CO Zip: 80108

LOCATION - Location ID: 317357

Location Name: CHRISTIANSON-63S50W Number: 12NENW County: \_\_\_\_\_

Qtrqtr: NENW Sec: 12 Twp: 3S Range: 50W Meridian: 6

Latitude: 39.814150 Longitude: -102.926389

FACILITY - API Number: 05-121- -00 Facility ID: 317357

Facility Name: CHRISTIANSON-63S50W Number: 12NENW

Qtrqtr: NENW Sec: 12 Twp: 3S Range: 50W Meridian: 6

Latitude: 39.814150 Longitude: -102.926389

CORRECTIVE ACTIONS:

1 CA# 170301

Corrective Action: Report spill or release of E&P waste or produced fluids, remove free fluids and contact COGCC EPS staff per Rule 912.b.(1)G. 24 hours to remove free fluids. 24 hours for notification and 72 hours for Initial Form 19 Report.

Date: 05/01/2023

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

Our compliance specialist(Ardor) along with myself(Brent) reviewed this corrective action and request for Rule 912 procedure. This is a housekeeping issue, not a spill or release. The "free fluid" in our injection pump house

Operator Comment: (photo 19) is water that collected after changing the water filter. We do acknowledge that this location is in need of housekeeping but also that there is or was no active spill or release in or out of containment. Any soil staining stemming from maintenance work was inside containment and cumulatively is much less than 1bbl total liquid, also far less than 10 cubic feet of impacted soil. Due to those factors we believe a Rule 912 violation and Form 19 reporting is not appropriate. This inspection took place on 4/20/2023, the operator was not notified till 6:49pm on 4/28/2023 via email. Some of these housekeeping issues were already being addressed during that time period. I tried to contact the inspector by phone to discuss. I left a voicemail but I have not heard back and due to the 912 request I wanted to supply some sort of response within 24hrs after being notified.

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

COGCC Representative: \_\_\_\_\_

**2** CA# 170302

Corrective Action: Comply with Rule 606 and remove all unused equipment.

Date: 05/06/2023

Response: CA COMPLETED

Date of Completion: 05/06/2023

Operator Comment: Will comply by CA date.

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

COGCC Representative: \_\_\_\_\_

**3** CA# 170303

Corrective Action: Comply with Rule 606 and remove all debris/trash from location.

Date: 05/06/2023

Response: CA COMPLETED

Date of Completion: 05/06/2023

Operator Comment: Wil comply by CA date.

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

COGCC Representative: \_\_\_\_\_

**4** CA# 170304

Corrective Action: Comply with Rule 606. Storage of supplies, equipment, etc is prohibited on location.

Date: 05/12/2023

Response: CA COMPLETED

Date of Completion: 05/12/2023

Operator Comment: Wil comply by CA date.

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

COGCC Representative: \_\_\_\_\_

**5** CA# 170305

Corrective Action: Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.

Date: 05/13/2023

Response: CA COMPLETED

Date of Completion: 05/13/2023

Operator Comment: In process and near completion

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

COGCC  
Representative: \_\_\_\_\_

**6** CA# 170306

Corrective Action: Perform reclamation in accordance with Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, 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 the location meets Rule 1003 standards. Corrective action date is the date the location was observed out of compliance.

Date: 04/20/2023

Response: CA COMPLETED

Date of Completion: 05/05/2023

Operator  
Comment: This work will commence ASAP

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

COGCC  
Representative: \_\_\_\_\_

**7** CA# 170307

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective action date is the date the location was observed out of compliance, as it should be in compliance at all times.

Date: 04/20/2023

Response: CA COMPLETED

Date of Completion: 05/13/2023

Operator  
Comment: Will comply and commence work ASAP.

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

COGCC  
Representative: \_\_\_\_\_

#### OPERATOR COMMENT AND SUBMITTAL

Comment: Our compliance specialist(Ardor) along with myself(Brent) reviewed this corrective action and request for Rule 912 procedure. This is a housekeeping issue, not a spill or release. The "free fluid" in our injection pump house(photo 19) is water that collected after changing the water filter. We do acknowledge that this location is in need of housekeeping but also that there is or was no active spill or release in or out of containment. Any soil staining stemming from maintenance work was inside containment and cumulatively is much less than 1bbl total liquid, also far less than 10 cubic feet of impacted soil. Due to those factors we believe a Rule 912 violation and Form 19 reporting is not appropriate. This inspection took place on 4/20/2023, the operator was not notified till 6:49pm on 4/28/2023 via email. Some of these housekeeping issues were already being addressed during that time period. I tried to contact the inspector by phone to discuss. I left a voicemail but I have not heard back and due to the 912 request I wanted to supply some sort of response within 24hrs after being notified.

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

Print Name: Brent Bongers

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

Title: President/COO

Date: 4/29/2023 5:27:52 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>

Total Attach: 0 Files