

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403400935

Date Received:
05/12/2023

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: 81490
Name of Operator: ST CROIX OPERATING INC
Address: P O BOX 13799
City: DENVER State: CO Zip: 80201

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Melnychenko, Paul</u>	<u>(303) 489-9298</u>	<u>stcroixexp@aol.com</u>
<u>Andy Peterson</u>		<u>Andy@PEOperating.com</u>
<u>Trisha Fanning</u>		<u>tfanning@ardorenvironmental.com</u>
<u>Ryan Dornbos</u>		<u>Ryan@PEOperating.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 708200179
Inspection Date: 04/20/2023 FIR Submit Date: 04/28/2023 FIR Status: _____

Inspected Operator Information:

Company Name: ST CROIX OPERATING INC Company Number: 81490
Address: P O BOX 13799
City: DENVER State: CO Zip: 80201

LOCATION - Location ID: 317392

Location Name: YOUNG SWD-63S50W Number: 11NWNE County: _____
Qtrqtr: NWNE Sec: 11 Twp: 3S Range: 50W Meridian: 6
Latitude: 39.813520 Longitude: -102.941730

FACILITY - API Number: 05-121-00 Facility ID: 317392

Facility Name: YOUNG SWD-63S50W Number: 11NWNE
Qtrqtr: NWNE Sec: 11 Twp: 3S Range: 50W Meridian: 6
Latitude: 39.813520 Longitude: -102.941730

CORRECTIVE ACTIONS:

CA# 170299

Corrective Action: Install proper guy line markes per Rule 603.j. Date: 05/12/2023

Response: CA COMPLETED Date of Completion: 05/01/2023

Taller markers have been installed as of 5/1/2023.

Operator
Comment:

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

2  CA# 170300

Corrective Action: Perform reclamation in accordance to 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: 04/20/2023

Operator Comment: The Surface Use Agreement filed 5/29/2008, Document Number 1901160, was agreed to and effective 04/01/2008 between the Operator and Landowner pertaining specifically to NWNE Sec. 11-T3S-R50W containing approximately 2.00 acres more or less and also containing the Young 31-11350 SWD Well. The terms agreed upon allow for 2 acres of unrestricted and exclusive use of the surface lands, for operating and maintaining the injection well and its fixtures and facilities, and allows for ingress and egress of the lands. This Surface Use Agreement is available on COGIS and is a part of the filings related to UIC permitting.

The attached map shows three depictions of the Young SWD 31-11350 Site.

The top left map shows the current area, with the original disturbance created in 2006 during the drilling of the well and facility building overlain and traced in green. This total disturbance was about 2.5 acres.

The bottom left map shows the current area with the original 2.5-acre disturbance outlined in green, the 0.7-acre area required by the well and facility outlined in red, and the 0.5-acre area required by just the facility outlined in yellow.

The right-side map is a current view of the facility with the outlines of the areas required for operations and maintenance of the injection well, its fixtures and its facilities. The blue shaded area between the rig anchors is used for well service operations and does not require reclamation until the abandonment of the well and termination of the lease, however it is clear there is native vegetation encroaching which we do not intend to remove. The yellow shaded area at the facility entrance and around the exterior of the berms provides space for trucks to turn around, and allows for access to all sides of the facility for operations and maintenance. As shown, the total disturbed area that is being used for the operation and maintenance of the injection well, its fixtures and facilities is approximately 0.7 acres, which is less than half of the allowed disturbance of 2.00 acres permitted by the surface use agreement. Areas disturbed contain road base, gravel, or vegetation to assist with sediment control and prevent erosion. Boundaries are carefully monitored and treated as necessary.

St. Croix will continue to monitor the location to maintain the disturbed areas to control sediments, but does not plan to change the area that is disturbed since it provides the necessary access to the well for operations and maintenance of its fixtures and facilities as permitted by the surface use agreement. Areas cited in the inspection are currently used for operations at this well and facility.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC decision "Not Approved". The areas illustrated within the inspection Photos 1 and 2 are not properly stabilized, therefore, the Operator needs to either perform reclamation to establish perennial vegetation for stabilization, or bring in gravel/road base to stabilize the production areas. The area south of the tank battery (Photo 3) appears to be stabilized with gravel. In terms of the SUA, that is a civil matter and the Operator must be in compliance with COGCC Rules.

OPERATOR COMMENT AND SUBMITTAL

Comment: Operator and Land Owner are in regular contact and both are in agreement as to the areas disturbed being adequate and not excessive in size.

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

Print Name: Ryan Dornbos

Signed: _____

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>
403400935	FIR RESOLUTION SUBMITTED
403401127	MAP

Total Attach: 2 Files