

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

403401318

Date Received:

05/12/2023

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

3 of 3 CAs from the FIR responded to on this Form

3 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

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Melnychenko, Paul

(303) 489-9298

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Andy Peterson

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Ryan Dornbos

Ryan@PEOperating.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 708200192

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: 317374

Location Name: Hickert Number: 41C-18349 County: _____

Qtrqr: NENE Sec: 18 Twp: 3s Range: 49W Meridian: 6

Latitude: 39.798500 Longitude: -102.898806

FACILITY - API Number: 05-121-00 Facility ID: 317374

Facility Name: Hickert Number: 41C-18349

Qtrqr: NENE Sec: 18 Twp: 3s Range: 49W Meridian: 6

Latitude: 39.798500 Longitude: -102.898806

CORRECTIVE ACTIONS:

1 ☒ CA# 170308

Corrective Action: Comply with reclamation rules to remove all equipment (regardless of ownership) within three months of plugging (05/05/2021) the associated facility. All work should have been completed by 08/05/2021. Corrective action date is being backdated to when all equipment should have been removed.

Date: 08/05/2021

Response: CA COMPLETED

Date of Completion: 04/20/2023

It is unclear where the cattle panels came from, since the fences used for the facility are made from barbed wire.

Operator Comment: St. Croix does not claim ownership of the panels. St. Croix personnel were onsite later on the same day of 4/20/2023 to evaluate reclamation progress for potential planting in 2023 and placed the panels inside the fencing to prevent impacts to wildlife or the environment. The panels will be removed when reclamation planting takes place, despite the fact they were/are not related to St. Croix Operations.

Fencing will be repaired and remain in place during continued reclamation activities to prevent the several hundred head of cattle that graze this area from destroying the sprouting seeds and efforts related to reclamation. These locations were decommissioned, location was de-compacted, and seeded (with a seed drill) with land owner approved seed mix in the late winter/early spring of 2022. 2022 was a very dry year and despite some early progress, the hot and dry summer and fall prevented adequate vegetation. Progress was monitored through the year and visits in spring of 2023 illustrate further action is required. Another round of seeding is planned and will include additional nutrient application to help vegetation establish. This area has a soil classification of Valent Sand as deemed by NRCS, which can be very difficult to establish vegetation and does not respond well to disturbances or tillage. Our minimal disturbance approach and repeated application of seeds and nutrients takes into-account the nature of the sand and the surrounding environment.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved". 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; Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). Original corrective action and date remains applicable. The location will remain out of compliance until all equipment has been removed from the location.

2  CA# 170309

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

Date: 05/06/2023

Response: CA COMPLETED

Date of Completion: 04/20/2023

Operator Comment: It is unclear where the cattle panels came from since the fences used for the facility were barbed wire, and St. Croix does not claim ownership of the panels. St. Croix personnel were onsite later on 4/20/2023 to evaluate reclamation progress for potential planting in 2023 and placed the panels inside the fencing to prevent impacts to wildlife or the environment. The panels will be removed when reclamation planting takes place, despite they are not relate to St. Croix Operations.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved". 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; Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). Original corrective action and date remains applicable. The location will remain out of compliance until all debris/equipment has been removed from the location.

3  CA# 170310

Corrective Action: Comply with Rule 1004. Reclaim access road, remove debris, and reseed disturbance areas using a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil. Operator shall continue to monitor and manage this site until the location meets Rule 1004 standards, including stormwater and weed management. 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: Fencing will be repaired and will remain in place during continued reclamation activities to prevent the several hundred head of cattle that graze this area from destroying the sprouting seeds and efforts related to reclamation. The fencing is not considered debris and is considered related to the reclamation efforts at hand. The road is not compacted since it is made from sand and we do not intend to add disturbance to the area by regrading the road. Additional disturbance to regrade or rip the road would damage the environment and the soil biology that is extremely fragile and plays a major role in attempting to reclaim the areas. The road was seed drilled in 2022 with the rest of the facility and did show some vegetation at first, but did not last due to drought conditions last summer. St. Croix intends to plant in spring of 2023.

These locations were decommissioned, location was de-compacted, and seeded (with a seed drill) with land owner approved seed mix in the late winter/early spring of 2022. 2022 was a very dry year and despite some early progress, the hot and dry summer and fall prevented adequate vegetation. Progress was monitored through the year and visits in spring of 2023 illustrate further action is required. Another round of seeding is planned and will include additional nutrient application to help vegetation establish. This area has a soil classification of Valent Sand as deemed by NRCS, which can be very difficult to establish vegetation and does not respond well to disturbances or tillage. Our minimal disturbance approach and repeated application of seeds and nutrients takes into-account the nature of the sand and the surrounding environment.

Erosion controls to be applied include, no additional soils disturbance to include ripping or tillage, planting of vegetation, application of hum-alpha, and blowing of CRP hay across the area to hold ground add seed and some organic material.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved". 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; Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). Original corrective action and date remains applicable.

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: Ryan Dornbos

Signed: _____

Title: Petroleum Engineer

Date: 5/12/2023 4:31:40 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>
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403401318	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files