

State of Colorado  
Energy & Carbon Management Commission



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Document Number:  
403505279

Date Received:  
08/22/2023

**FIR RESOLUTION FORM**

Overall Status: CAC

CA Summary:

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

1 CA Completed  
0 Factual Review Request

**OPERATOR INFORMATION**

OGCC Operator Number: 10456  
Name of Operator: CAERUS PICEANCE LLC  
Address: 1001 17TH STREET #1600  
City: DENVER State: CO Zip: 80202

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Romana Cowden</u>	<u>720-951-5895</u>	<u>COGCC.inspections@caerusoilandgas.com</u>

**COGCC INSPECTION SUMMARY:**

FIR Document Number: 696205124  
Inspection Date: 07/31/2023 FIR Submit Date: 08/01/2023 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: CAERUS PICEANCE LLC Company Number: 10456  
Address: 1001 17TH STREET #1600  
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 323925

Location Name: KRK-67S92W Number: 7SWNE County: \_\_\_\_\_  
Qtrqtr: SWNE Sec: 7 Twp: 7S Range: 92W Meridian: 6  
Latitude: 39.462840 Longitude: -107.707970

FACILITY - API Number: 05-045-00 Facility ID: 323925

Facility Name: KRK-67S92W Number: 7SWNE  
Qtrqtr: SWNE Sec: 7 Twp: 7S Range: 92W Meridian: 6  
Latitude: 39.462840 Longitude: -107.707970

**CORRECTIVE ACTIONS:**

1  CA# 176911

Corrective Action: Comply with 1004 rules; conduct compaction alleviation (cross-ripping) to a minimum depth of 18 inches in accordance with Rule 1003.c on the entire access road and Location. Operator shall document reclamation and compaction alleviation activities performed, and upon completion, Operator shall submit date-stamped photo documentation of the reclamation and compaction alleviation work attached to a Field Inspection Resolution Form.

Date: 07/31/2023

Response: CA COMPLETED Date of Completion: 08/08/2023

Operator Comment: Initial earthwork operations were completed in June. Subsoils throughout the well pad were ripped to 18 inches, per Caerus standard operating procedures. The well pad recontouring was completed with a motor grader, which cannot uniformly move soils unless they are ripped first. During soil ripping of the access road native boulders

were encountered, hindering ripping and pulling the rocks near or to the surface. To prevent pulling boulders to the surface, shanks were set at 12 inches and decompaction was completed. Linear disturbances cannot be cross-ripped without expanding the disturbance or trampling established vegetation outside the earthwork boundaries. Therefor Caerus completes multiple passes down linear disturbances to ensure soils are properly decompacted. If resistance is low, equipment rips in a serpentine pattern. If soils are rocky, this becomes much more difficult and can result in equipment damage, such as broken shanks. Following ripping and recontouring, available topsoil was redistributed and initial earthwork was completed in late June. See 6/28 photo in attached photo log. Fence installation was completed in July when soil moisture was increased following a rainstorm. Driving on the reclaim area did result in surface compaction along the road and southern reclaim. The road and southern reclaim area was re-ripped on August 8th. The northern pad area, where fencing traffic did not impact earthwork, was not re-ripped. These areas were not compacted beyond what is typical of the clayey soils in months with a fluctuating moisture regime. A 14-inch soil trowel was capable of being fully plunged on August 8th. In preparation for seeding operations, the disturbance is disked to break up any surface compaction, aerate soils, and create a preferable seed bed for drill seeding. During seeding, soil amendments, such as humates and Lot 125, are applied to rebuild topsoil and mitigate natural surface compaction in the clayey soils. In addition, straw mulch is crimped to increase stormwater infiltration and further mitigating soil compaction until perennial grasses are established. The establishment of vegetation with healthy root systems prevents natural surface compaction long-term. Due to the high clay content of soils, surface compaction may be noted in the future following precipitation, but Caerus believes the work completed will result in the rebuilding of topsoil and successful reclamation.

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 ECMC rules.

**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: Romana Cowden

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

Title: EHS

Date: 8/22/2023 12:02:54 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b>Document Number</b>	<b>Description</b>
403505279	FIR RESOLUTION SUBMITTED
403505284	Photo Log

Total Attach: 2 Files