

State of Colorado  
Energy & Carbon Management Commission



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Document Number:  
402854089

Date Received:  
10/27/2021

**FIR RESOLUTION FORM**

Overall Status: FRQ

CA Summary:

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

0 CA Completed  
1 Factual Review Request

**OPERATOR INFORMATION**

ECMC 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>

ECMC INSPECTION SUMMARY:

FIR Document Number: 699803734  
Inspection Date: 10/21/2021 FIR Submit Date: 10/21/2021 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: 334983

Location Name: Federal Multi Well Number: 28-5BB (PA-29) County: \_\_\_\_\_  
Qtrqr: Lot 1 Sec: 29 Twp: 7S Range: 95W Meridian: 6  
Latitude: 39.412550 Longitude: -108.015790

FACILITY - API Number: 05-045-00 Facility ID: 334983

Facility Name: Federal Multi Well Number: 28-5BB (PA-29)  
Qtrqr: Lot 1 Sec: 29 Twp: 7S Range: 95W Meridian: 6  
Latitude: 39.412550 Longitude: -108.015790

CORRECTIVE ACTIONS:

1  CA# 157167

Corrective Action: All Tanks with a capacity of 10 Barrels or greater will be labeled with Name of operator, Operator's emergency contact telephone number, Tank capacity, Tank contents, and NFPA label or equivalent globally harmonized label. Date: 12/20/2021

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

The separator and associated glycol bath are considered a process vessel. They are not a Tanks, as defined by the rules, as they do not contain "produced fluids or E&P Waste," nor are they a Containers as they are not

Operator  
Comment:

portable devices and do not contain "hazardous material." Rule 605.h. applies to specifically to Tanks and Containers; as these process vessels are neither, they are not subject to Rule 605.h. and this corrective action is not applicable:

· TANK shall mean a stationary vessel constructed of non-earthen materials (e.g concrete, steel, plastic) that provides structural support and is designed and operated to store produced fluids or E&P waste. Examples include, but are not limited to, condensate tanks, crude oil tanks, produced water tanks, and gun barrels. Exclusions include Containers and process vessels such as separators, heater treaters, free water knockouts, and slug catchers.  
· CONTAINER shall mean any portable device in which a hazardous material is stored, transported, treated, disposed of, or otherwise handled. Examples include, but are not limited to, drums, barrels, totes, carboys, and bottles.

ECMC Decision: Approved pending re-inspection

ECMC  
Representative:

**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: 10/27/2021 7:30:22 AM

**ATTACHMENT LIST**

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

<b><u>Document Number</u></b>	<b><u>Description</u></b>
402854089	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files