

# State of Colorado Energy & Carbon Management Commission



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Document Number:  
404087691

Date Received:  
02/17/2025

## FIR RESOLUTION FORM

**Overall Status:**

CA Summary:  
9 of 9 CAs from the FIR responded to on this Form  
9 CA Completed  
0 Factual Review Request

### OPERATOR INFORMATION

ECMC Operator Number: 10814  
Name of Operator: MDS ENERGY DEVELOPMENT LLC  
Address: 409 BUTLER RD SUITE A  
City: KITTANNING State: PA Zip: 16201  
Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Kelsi Welch</u>		<u>kelsi.welch@iptwell.com</u>
<u>Jim Jacobsen</u>		<u>jim.jacobsen@iptwell.com</u>

ECMC INSPECTION SUMMARY:

FIR Document Number: 718700031  
Inspection Date: 02/03/2025 FIR Submit Date: 02/04/2025 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: MDS ENERGY DEVELOPMENT LLC Company Number: 10814  
Address: 409 BUTLER RD SUITE A  
City: KITTANNING State: PA Zip: 16201

LOCATION - Location ID: 471039

Location Name: Castor 7-59 Number: 10 County: \_\_\_\_\_  
Qtrqtr: SWSE Sec: 10 Twp: 7N Range: 59W Meridian: 6  
Latitude: 40.583600 Longitude: -103.963208

FACILITY - API Number: 05-123-00 Facility ID: 471039

Facility Name: Castor 7-59 Number: 10  
Qtrqtr: SWSE Sec: 10 Twp: 7N Range: 59W Meridian: 6  
Latitude: 40.583600 Longitude: -103.963208

CORRECTIVE ACTIONS:

**1** CA# 202296

Corrective Action: Comply with Rule 1002.f.(2)B to implement or modify BMPs for improved material handling and spill prevention. Date: 02/06/2025

Response: CA COMPLETED Date of Completion: 02/04/2025

Operator Comment: BMPs for improved material handling and spill prevention have been implemented. Please reference attached photo #1.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative:

**2** CA# 202297

Corrective Action: Conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f(2).D

Date: 02/08/2025

Response: CA COMPLETED

Date of Completion: 02/04/2025

Operator Comment: Maintenance conducted on equipment, stained material cleaned up and self inspection processes per Rule 1002.f(2) have been reviewed. Please reference attached Photos #7, #8, #9, #10, #11, #13, #14, #15 & #16.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative:

**3** CA# 202298

Corrective Action: Comply with Rule 606 to remove all trash and debris.

Date: 02/11/2025

Response: CA COMPLETED

Date of Completion: 02/04/2025

Operator Comment: Trash and debris has been removed. Please reference attached photo #2, #3, #4, #5

ECMC Decision: \_\_\_\_\_

ECMC  
Representative:

**4** CA# 202299

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: 02/05/2025

Response: CA COMPLETED

Date of Completion: 02/04/2025

Operator Comment: All valves, pipes, fittings, and Production Facilities have been securely fastened to ensure good mechanical condition.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative:

**5** CA# 202300

Corrective Action: Install or repair wildlife protection equipment per Rule 902.b.

Date: 02/05/2025

Response: CA COMPLETED

Date of Completion: 02/04/2025

Operator Comment: Hole has been backfilled. Please reference attached photo #12.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative:

**6** CA# 202301

Corrective Action:

Date: 02/05/2025

Operator shall immediately ensure operations are safe and will properly install safety controls and/or backfill the observed hole/subsidence pursuant to Rule 602.c.

Response: CA COMPLETED

Date of Completion: 02/04/2025

Operator Comment: Pothole has been backfilled. Please reference attached photo #6.

ECMC Decision: \_\_\_\_\_

ECMC Representative: \_\_\_\_\_

**7** CA# 202302

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a.  
In accordance with 913.d. (1) Operator will investigate impacts to soil, groundwater, and surface water as soon as the impacts are discovered. The operator shall report the spill/release via Form 19 to the ECMC. Contact ECMC Staff Krystal Heibel (krystal.heibel@state.co.us) with any questions.

Date: 02/05/2025

Response: CA COMPLETED

Date of Completion: 02/05/2025

Operator Comment: The observed fluid documented in Inspection Photo #27 is not hydrocarbons, it is water from snowmelt so no Form 19 is required. Water was vacuumed out of rat/mouse hole (total volume was <5 gallons of water) and hole has been backfilled. Please reference attached photo #12.

ECMC Decision: \_\_\_\_\_

ECMC Representative: \_\_\_\_\_

**8** CA# 202303

Corrective Action: Submit FIRR with documentation of topsoil importation activities and explanation of missing topsoil from existing stockpile.

Date: \_\_\_\_\_

Response: CA COMPLETED

Date of Completion: 02/17/2025

Operator Comment: As approved with sundry doc #403684816, MDS was required to import at least 3,000 cubic yards of topsoil to the Castor 7-59 10 Pad for the purposes of reclamation. A total of approximately 3,500 cubic yards of topsoil was imported onto the location via 355 truckloads carrying approximately 10 cubic yards of topsoil each. After conversations with the ECMC reclamation staff, it was determined that additional disturbance beyond what was originally approved with the Form 2A could be reclaimed. The missing topsoil from the existing stockpile (approximately 500 cubic yards) was used to complete interim reclamation on the additional disturbance no longer needed for production. Truck ticket for hauled topsoil has been attached.

ECMC Decision: \_\_\_\_\_

ECMC Representative: \_\_\_\_\_

**9** CA# 202304

Corrective Action: Best management practices to prevent weed establishment shall be implemented. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted.

Date: \_\_\_\_\_

Response: CA COMPLETED

Date of Completion: 02/05/2025

Operator Comment: Weeds prevention BMPs have been implemented.

ECMC Decision: \_\_\_\_\_

ECMC Representative: \_\_\_\_\_

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: Kelsi Welch

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

Title: Permitting & Compliance

Date: 2/17/2025 3:09:24 PM

**ATTACHMENT LIST**

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

<u>Document Number</u>	<u>Description</u>
404087709	Location Photos
404096305	Truck Ticket

Total Attach: 2 Files