

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
401299079  
Date Received:  
06/02/2017

FIR RESOLUTION FORM

CA Summary:  
2 of 2 CAs from the FIR responded to on this Form  
0 CA Completed  
2 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 49100  
Name of Operator: KOCH EXPLORATION COMPANY, LLC  
Address: 950 17TH STREET #1900  
City: DENVER State: CO Zip: 80202  
Contact Name and Telephone:  
Name:  
Phone: ( ) Fax: ( )  
Email:

Additional Operator Contact:

Contact Name	Phone	Email
Jordan Radin	720-201-4941	radinj@kochind.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 680101798  
Inspection Date: 05/26/2017 FIR Submit Date: 05/29/2017 FIR Status:

Inspected Operator Information:

Company Name: KOCH EXPLORATION COMPANY, LLC Company Number: 49100  
Address: 950 17TH STREET #1900  
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 391071

Location Name: HORSESHOE CANYON-69S97W Number: 33SENE County: MESA  
Qtrqtr: SENE Sec: 33 Twp: 9S Range: 97W Meridian: 6  
Latitude: 39.233421 Longitude: -108.216287

FACILITY - API Number: 05-077-00 Facility ID: 221629

Facility Name: HORSESHOE CANYON Number: 4  
Qtrqtr: SENE Sec: 33 Twp: 9S Range: 97W Meridian: 6  
Latitude: 39.233421 Longitude: -108.216287

CORRECTIVE ACTIIONS:

1 CA# 78337

Corrective Action: All Risers/ Flowlines/ Pipelines must abide by the phase I of the May 2, 2017 Flowline NTO. Respond when corrective action is complete with date completed and photos attached to an FIRR response to CA. Make sure to identify both endpoints of all riser Risers/ Flowlines/ Pipelines .

Date: 05/31/2017

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment is not owned or controlled by the operator

The two risers noted in the FIR are part of an active 6" gathering line system owned and operated by Black Hills. Consequently, these active gathering line risers shouldn't be associated with the plugged and abandoned KEC

Operator Comment: Horseshoe Canyon #4 site. KEC requests that the FIR be amended such that gathering line riser ownership is attributed to Black Hills.

The gathering line risers, although not flow lines as defined by the 2017 Flow Line NTO, have been marked with orange spray paint.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Staff, including Margaret Ash Field Inspection Manager and Mike Leonard Quality Assurance Professional have been reviewing the subject 2 inch riser issue. It appears clear that this riser was in place specifically for the subject well that is now PA and therefore has no function. Per the reclamation rules 1004 (a) this riser is the responsibility of the Well Operator to remove or coordinate removal. Until the riser is removed the location will not pass final reclamation. There were corrective action inspections for this location requiring reclamation and the removal of the riser in 2000, 2009, 2011, and 2017. The 1 inch riser along the road does not need to be removed.

2 CA# 78338

Corrective Action: All Risers/ Flowlines/ Pipelines must abide by the Phase II of the May 2, 2017 Flowline NTO. Respond when corrective action is complete with date completed and photos attached to an FIRR response to CA. Make sure to identify both endpoints of all Risers/ Flowlines/ Pipelines.

Date: 06/30/2017

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment is not owned or controlled by the operator

Operator Comment: The two risers noted in the FIR are part of an active 6" gathering line system owned and operated by Black Hills. Consequently, these active gathering line risers shouldn't be associated with the plugged and abandoned KEC Horseshoe Canyon #4 site. KEC requests that the FIR be amended such that gathering line riser ownership is attributed to Black Hills.

The gathering line risers, although not flow lines as defined by the 2017 Flow Line NTO, have been marked with orange spray paint.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Staff, including Margaret Ash Field Inspection Manager and Mike Leonard Quality Assurance Professional have been reviewing the subject 2 inch riser issue. It appears clear that this riser was in place specifically for the subject well that is now PA and therefore has no function. Per the reclamation rules 1004 (a) this riser is the responsibility of the Well Operator to remove or coordinate removal. Until the riser is removed the location will not pass final reclamation. There were corrective action inspections for this location requiring reclamation and the removal of the riser in 2000, 2009, 2011, and 2017. The 1 inch riser along the road does not need to be removed.

#### OPERATOR COMMENT AND SUBMITTAL

Comment: The two risers noted in the FIR are part of an active 6" gathering line system owned and operated by Black Hills. Consequently, these active gathering line risers shouldn't be associated with the plugged and abandoned KEC Horseshoe Canyon #4 site. KEC requests that the FIR be amended such that riser ownership is attributed to Black Hills.

The gathering line risers, although not flow lines as defined by the 2017 Flow Line NTO, have been marked with orange spray paint.

The Black Hills ownership of the risers is also noted in the pending 502(b) variance request doc# 401255033.

I've attached email correspondence from Black Hills verifying riser ownership and operating status.

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

Print Name: Jordan Radin

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

Title: Compliance Manager

Date: 6/2/2017 2:00:56 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>
401299079	FIR RESOLUTION SUBMITTED
401299152	Email from Black Hills acknowledging riser ownership and photos.

Total Attach: 2 Files