

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
401456391
Date Received:
11/13/2017

FIR RESOLUTION FORM

CA Summary:
1 of 1 CAs from the FIR responded to on this Form
1 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: ()
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Additional Operator Contact:

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COGCC INSPECTION SUMMARY:

FIR Document Number: 682502777
Inspection Date: 11/09/2017 FIR Submit Date: 11/10/2017 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: 452312

Location Name: SCOUT-NIEBUR Number: 1 County:
Qtrqtr: SESE Sec: 35 Twp: 2S Range: 51W Meridian: 6
Latitude: 39.832090 Longitude: -103.050210

FACILITY - API Number: 05-121- -00 Facility ID: 452312

Facility Name: SCOUT-NIEBUR Number: 1
Qtrqtr: SESE Sec: 35 Twp: 2S Range: 51W Meridian: 6
Latitude: 39.832090 Longitude: -103.050210

CORRECTIVE ACTIIONS:

1 CA# 110226

Corrective Action: Properly select, install and maintain required site specific stormwater and sediment control BMPs in such a manner that minimizes erosion, transport of sediment offsite, and site degradation per 1002.f

Date: 11/09/2017

Operator Comment: St. Croix believes one critical BMP for sites in this area is minimal topsoil disturbance, followed by quick restoration of any disturbed areas. The undisturbed topsoil and CRP grass coverage under the rig and trafficked areas held up nicely for the duration of the drilling phase. No breakthrough of grass coverage occurred in the trafficked areas. These areas will restore naturally in a short time frame, with minimal lasting damage.

The segregated topsoil pile on the south end of location was hydromulch stabilized. The subsoil piles around the reserve pit were not hydromulched stabilized. St. Croix plans to begin interim pit closure operations in approximately two weeks. During this interim restoration the subsoil piles will be partially reincorporated into the reserve pit. Soil stabilization installed during initial pit construction will be destroyed during interim reclamation. As a result the decision was made not to stabilize the subsoil piles upon initial construction. Following interim reclamation operations, St. Croix will again evaluate what form of soil stabilization is required.

COGCC Decision: **Not Approved**

COGCC Representative: Not approving resolution. COGCC rule 1002.c requires that "All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations". This location is out of compliance; Erosion controls (stormwater and wind) need to be in place during operations. It is the operator's responsibility to implement and maintain BMPs to minimize erosion, transport of sediment offsite, and site degradation in accordance to 1002.f. and for maintaining BMPs until final reclamation is achieved pursuant to Rule 1004.

Original corrective action and corrective action date remains applicable. This is the second corrective action with issues regarding stormwater management. This is being referred to enforcement.

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: Paul Gottlob Signed: _____
 Title: Regulatory & Engin. Tech. Date: 11/13/2017 7:38:49 AM

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>
401456391	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files