

STATE OF
COLORADO

Roy - DNR, Catherine <catherine.roy@state.co.us>

FIRRR Resolutions

2 messages

Larissa Farrell <lfarrell@logosresourcesllc.com>
To: "catherine.roy@state.co.us" <catherine.roy@state.co.us>
Cc: Darren Rowley <drowley@logosresourcesllc.com>

Mon, Mar 4, 2019 at 4:04 PM

Hi Catherine,

I wanted to follow up my voicemail today with an email explaining the questions that I had regarding the recently processed FIRRR forms.

401943831 – Bondad 33-10 10: The cable mentioned in the initial inspection was removed in January. There was a few other pieces that were also removed. I apologize if my comment did not reflect the action taken. Please let me know if I need to do anything further to have this compliance issue cleared.

401817956 – Colorado 32-7 11: The surface owners property was removed by the surface owner and relocated. I would like to understand the reason for needing to submit a variance and which rule we would need to reference. Can you please provide additional information or guidance regarding this COGCC Decision? When are you available to meet with Darren and I on location to look around and discuss this variance?

The general question that I have regarding these inspections is that the entire project area is listed as the area that Logos is responsible for. I have tried to research these wells to find the original permitted area and have been unsuccessful. These wells were drilled decades ago before the current COGCC rules and regulations were in effect. There is no surface use agreement between the landowner and LOGOS Operating, LLC nor is there documentation clearly defining where LOGOS Operating has the authority to operate with the exception of the rig anchor pattern. I hope we can discuss further so we can both be on the same page and maybe you can give me some guidance on where I can find this information.

You may call me on my cell anytime.

Have a good evening!

Thank you,

Larissa Farrell

Environmental/Regulatory Technician

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Roy - DNR, Catherine <catherine.roy@state.co.us>

Tue, Apr 2, 2019 at 2:46 PM

To: Larissa Farrell <lfarrell@logosresourcesllc.com>, Denise Arthur - DNR <Denise.Arthur@state.co.us>

Cc: Darren Rowley <drowley@logosresourcesllc.com>

Ms. Farrell and Mr. Rowley,

COGCC staff and management have reviewed your questions and have made the following determination for these locations:

Review of historic aerial imagery indicates that debris identified on the locations is within the original project disturbance. In order for the debris to remain, an interim reclamation waiver will be required.

The interim reclamation waiver shall include a signed surface owner agreement taking responsibility for the equipment and debris, and needs to be submitted as an attachment to a Form 4 (with a comment to route to Catherine Roy). As part of the waiver requirements, Logos will continue to be required to manage the entire location for stormwater erosion, and weeds, as well as any leaking oil or any other potential stormwater contaminants coming from the equipment/debris stored on the location. For safety reasons, any surface owner equipment or debris will need to be stored at least 75 feet away from the well or production facilities. As part of the waiver agreement, it is likely that financial assurance will be required before approval.

If Logos determines that a surface owner waiver is desired; as the corrective action date is passed, the waiver will need to be submitted by June 1, 2019. Otherwise the location is subject to the COGCC 1003 interim reclamation rules and the areas will immediately need to be cleaned and reclaimed as needed.

Thank you,

Catherine Roy

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Catherine Roy
Southwest Reclamation Specialist

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