

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402119632

Date Received:  
07/24/2019

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

7 of 7 CAs from the FIR responded to on this Form

7 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 74165

Name of Operator: RENEGADE OIL & GAS COMPANY LLC

Address: 6155 S MAIN STREET #210

City: AURORA State: CO Zip: 80016

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Ingvie, Ed</u>	<u>(303) 680-4725</u>	<u>ed@renegadeoilandgas.com</u>
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COGCC INSPECTION SUMMARY:

FIR Document Number: 685100923

Inspection Date: 05/07/2019

FIR Submit Date: 05/07/2019

FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: RENEGADE OIL & GAS COMPANY LLC

Company Number: 74165

Address: 6155 S MAIN STREET #210

City: AURORA State: CO Zip: 80016

LOCATION - Location ID: 320071

Location Name: CHAMPLIN 485 AMOCO-61S61W Number: 25SESE County: ADAMS

Qtrqtr: SESE Sec: 25 Twp: 1S Range: 61W Meridian: 6

Latitude: 39.929920 Longitude: -104.152460

FACILITY - API Number: 05-001- -00 Facility ID: 202495

Facility Name: CHAMPLIN 485 AMOCO Number: 1

Qtrqtr: SESE Sec: 25 Twp: 1S Range: 61W Meridian: 6

Latitude: 39.929920 Longitude: -104.152460

CORRECTIVE ACTIONS:

1 CA# 124964

Corrective Action: For a spill - "Recover free liquids and properly dispose in accordance with 907.c." For ineffective treatment of produced water entering a pit (may be used in addition to 902.c.) "Improve or correct treatment method to prevent crude oil or condensate from entering pit prior to any further discharge to pit to comply with rule 907.c."

Date: 05/08/2019

Response: CA COMPLETED

Date of Completion: 05/14/2019

Operator Comment: Standing water was removed from water tank berm area per rule 907.c and firewall area was recontoured so any fluid would drain away from the tank. Standing water observed was rainwater from the very wet spring. Tank has been empty and bottomed out for years as no fluid has been produced from the well in years. See photo.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

2 CA# 124965

Corrective Action: Repair and paint tanks per Rule 804.

Date: 01/11/2019

Response: CA COMPLETED

Date of Completion: 07/23/2019

Operator Comment: All tanks painted per Rule 804. See photos

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

3 CA# 124966

Corrective Action: Repair and paint tanks per Rule 804.

Date: 01/11/2019

Response: CA COMPLETED

Date of Completion: 07/23/2019

Operator Comment: All tanks painted per Rule 804. See photos.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

4 CA# 124967

Corrective Action: Comply with Rule 603.f .

Date: 11/12/2018

Response: CA COMPLETED

Date of Completion: 07/24/2019

Operator Comment: Renegade disagrees with the need for a corrective action issuance under Rule 603.f. Submersible pumping electrical equipment on the pad adjacent to the well is NOT deemed unused equipment under Rule 603.f if used for the production of the well. This was confirmed via a phone conversation with Mike Leonard of the COGCC on 5/23/2019.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

5 CA# 124968

Corrective Action: Install or repair wildlife protection equipment Comply with rule 324 A.a

Date: 05/17/2019

Response: CA COMPLETED

Date of Completion: 05/14/2019

Operator Comment: Bird screen has been reinstalled on treater burner stack per rule 324 A.a. See photos.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

**6** CA# 124969

Corrective Action: Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.

Date: 06/07/2019

Response: CA COMPLETED

Date of Completion: 05/14/2019

Operator Comment: Oil stained soil has been cleaned up and removed. Oil stained piping has been wiped down. All fittings in question have been inspected and tightened to ensure good mechanical condition per Rule 605.d.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

**7** CA# 124970

Corrective Action: Net or fence pit to prevent access per rule 902.d.

Date: 05/14/2019

Response: CA COMPLETED

Date of Completion: 07/24/2019

Operator Comment: Renegade disagrees with this corrective action being issued for no pit fencing or netting. Rule 902.d states that fencing and netting are only required where necessary. Legacy production pits with no fencing and netting requirements in the original pit permit have NOT been required to install new fencing and netting unless a new issue have made it necessary. This was confirmed via a phone conversation with Mike Leonard and Bob Chesson of the COGCC on 5/23/2019. The COGCC CA matrix for Rule 902.d also refers to fencing or netting required by pit permit.

COGCC Decision: \_\_\_\_\_

COGCC Representative: \_\_\_\_\_

#### OPERATOR COMMENT AND SUBMITTAL

Comment: All undisputed corrective actions have been addressed. See photos. Renegade disputes the corrective action requirement to fence and net the legacy production pit. We also dispute the requirement to remove the electrical submersible equipment adjacent to the well on the well's cement pad. This was confirmed per conversations with Mike Leonard and Bob Chesson of the COGCC that the historical interpretation of the rules differs from the interpretation of the field inspector.

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

Print Name: Edward Ingve

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

Title: Manager/Owner

Date: 7/24/2019 4:28:33 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>
402121141	Water Tank and Berm
402121145	Back of Production Tanks
402121147	Front of Production Tanks
402121149	Treater looking East
402121193	Water Tank looking NE
402121196	Treater looking North
402121201	Treater looking South

Total Attach: 7 Files