

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401733591  
Date Received:  
08/14/2018

FIR RESOLUTION FORM

CA Summary:  
1 of 1 CAs from the FIR responded to on this Form  
0 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 77330  
Name of Operator: SG INTERESTS I LTD  
Address: 100 WAUGH DR SUITE 400  
City: HOUSTON State: TX Zip: 77007  
Contact Name and Telephone:  
Name:  
Phone: ( ) Fax: ( )  
Email:

Additional Operator Contact:

Contact Name	Phone	Email
Conklin, Curtis		curtis.conklin@state.co.us
catherine Roy		catherine.roy@state.co.us
SG		inspection@sginterests.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 680602889  
Inspection Date: 07/24/2018 FIR Submit Date: 08/13/2018 FIR Status:

Inspected Operator Information:

Company Name: SG INTERESTS I LTD Company Number: 77330  
Address: 100 WAUGH DR SUITE 400  
City: HOUSTON State: TX Zip: 77007

LOCATION - Location ID: 414132

Location Name: Cow Skull 11-89-18 Number: 1 County: GUNNISON  
Qtrqtr: NESW Sec: 18 Twp: 11S Range: 89W Meridian: 6  
Latitude: 39.098350 Longitude: -107.380690

FACILITY - API Number: 05-051-00 Facility ID: 441586

Facility Name: Cow Skull 11-89-18 Number: 6  
Qtrqtr: NESW Sec: 18 Twp: 11S Range: 89W Meridian: 6  
Latitude: 39.098350 Longitude: -107.380690

CORRECTIVE ACTIONS:

1  CA# 117871

Corrective Action: Remove and properly store unused equipment. Date: 11/25/2017

Response: FACTUAL REVIEW REQUEST

Basis for Review: Requested documentation was submitted prior to the inspection

An incorrect statement resulting in an additional CA is on the FIR stating "Multiple corrective actions have been issued for unused equipment at this location. Unused tubing, and pump jack pieces, are stored on the well pad." SG responded on 1/19/2018 via email to a similar CA. It is important for COGCC to understand that this CA to

Operator Comment: remove the pump jack and its associated equipment has been discussed several times with COGCC staff and the end result was a suggestion from Margaret Ash on 11/17/17 to submit a Sundry requesting delay of the CA. That day, on 11/17/17, SG submitted a sundry (401463307), and followed up with an email to several COGCC staff members stating a sundry was submitted. This sundry and emails are available to COGCC upon request if it cannot be found in your database. Why is COGCC not addressing this variance request, and continuing to give more corrective actions? SG has done our due-diligence in trying to stay in compliance. This is a wildcat field that needs to have COGCC respond to requests that do not fit within the rules for other operations. The requested timeframe to fix the CA has passed, SG needs to extend that request, however it appears there isn't a reasonable approach to take for this extension request.

COGCC Decision: Approved

COGCC Representative: Request Approved - Response delayed due to database issue - Per review of the Form 4 disclosure provided by SG Interests (Document 401515102) COGCC is approving the request to extend the corrective action date to August 31, 2018. COGCC finds the additional language in the request inaccurate and argumentative. Please note that SG Interests is expected to comply with COGCC rules and regulations whether or not operations are conducted in a wildcat field.

COGCC Supervisor: Request Approved - Response delayed due to database issue - Per review of the Form 4 disclosure provided by SG Interests (Document 401515102) COGCC is approving the request to extend the corrective action date to August 31, 2018. COGCC finds the additional language in the request inaccurate and argumentative. Please note that SG Interests is expected to comply with COGCC rules and regulations whether or not operations are conducted in a wildcat field.

#### 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: Amanda Blanchard

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

Title: Env & Reg Manager

Date: 8/14/2018 2:59:40 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>
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401733591	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files