

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402165778

Date Received:
09/06/2019

FIR RESOLUTION FORM

Overall Status: FRQ

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: 10261
Name of Operator: BAYSWATER EXPLORATION & PRODUCTION LLC
Address: 730 17TH ST STE 500
City: DENVER State: CO Zip: 80202

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Kevin Kane</u>	<u>303-893-2503</u>	<u>kkane@bayswater.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 697500547
Inspection Date: 08/29/2019 FIR Submit Date: 09/03/2019 FIR Status: _____

Inspected Operator Information:

Company Name: BAYSWATER EXPLORATION & PRODUCTION LLC Company Number: 10261
Address: 730 17TH ST STE 500
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 424905

Location Name: Bears Number: 4-30 County: _____
Qtrqr: NWN Sec: 30 Twp: 7N Range: 66W Meridian: 6
W
Latitude: 40.551013 Longitude: -104.829748

FACILITY - API Number: 05-123- -00 Facility ID: 424905

Facility Name: Bears Number: 4-30
Qtrqr: NWN Sec: 30 Twp: 7N Range: 66W Meridian: 6
W
Latitude: 40.551013 Longitude: -104.829748

CORRECTIVE ACTIIONS:

1 CA# 129980

Corrective Action: Comply with Rule 1004 to remove (regardless of ownership) all debris, abandoned gathering line risers, and flowline risers, and equipment within three months of plugging (2/4/2019) the associated facility. All work should have been conducted by 5/4/2019.

Date: 05/04/2019

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

Bayswater completed Bayswater owned battery equipment removal and battery site ground restoration on or

Operator Comment: around 4/4/2019. DCP was notified on or around 6/18/2019 to remove their gas meter piping. As stated in the report, the Bears 5-30 plugging is not completed. The Bears 5-30 a the second well associated with the Bears 4-30,5-30 facility. Bayswater has received confirmation from the landowner that the Bears battery site is not crop land, but rather has been subdivided by the landowner for residential use. By rule 1004, Bayswater should have 12 months on non-crop land to complete all equipment removal, which is anticipated to include DCP gas meter piping removal. Bayswater believes that CA date should be tied to the completion of the plugging of the Bears 5-30 well. It is anticipated that final plugging will take place late 2019 or early 2020.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: COGCC does not agree with the assessment made by Bayswater and they Operator has not provided sufficient information. The tank battery has obviously been decommissioned and therefore it cannot be associated with the Bear 5-30 well. The tank battery is being associated with the plugging of the subject well, the Bears 4-30. Additionally, the compliance dates relate to when the tank battery was decommissioned. Reclamation of the tank battery is required and the CA dates still stand.

2  CA# 129981

Corrective Action: Comply with Rule 1004. Collaborate with the landowner to determine mitigating measures that will allow reclamation work to be conducted in such a manner as to not interfere with agricultural activities or crop production. Corrective action date is being back-dated to when all final reclamation work should have been completed.

Date: 05/04/2019

Response: FACTUAL REVIEW REQUEST

Basis for Review: CA dates are not per the guidelines

Operator Comment: Similar to the response for CA#129980, Bayswater believes that the CA date should, 1). reflect the completion of final plugging of the Bears 5-30 well, which is anticipated to be completed in late 2019 or early 2020. 2). consider the fact that the reclaimed Bears battery location is located on non-crop land and therefore should allow 12 months for final reclamation completion. Bayswater has and is in collaboration with the landowner as to the intended use for the non-crop land of the reclaimed Bears battery site.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: COGCC does not agree with the assessment made by Bayswater and the Operator has not provided sufficient information. The tank battery has obviously been decommissioned and therefore it cannot be associated with the Bear 5-30 well. The tank battery is being associated with the plugging of the subject well, the Bears 4-30. Additionally, the compliance dates relate to when the tank battery was decommissioned. Reclamation of the tank battery is required and the CA dates still stand.

OPERATOR COMMENT AND SUBMITTAL

Comment: The FIR Doc.697500547 COGCC general comments refer to a Final Reclamation Completion Notice Doc. #401941317 that was apparently incorrectly submitted by Bayswater prior to final flowline, battery, access road reclamation. It should be noted that Doc. #401941317 was submitted for final reclamation of the wellsite of the Bears 4-30 that was plugged in 2017. Per Bayswater's understanding of Rule 1004, the statement, "All such reclamation work shall be completed within three (3) months on crop land and twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities." In this case of the Bears 4-30 was the plugging of one well of a multiple well facility. The submittal of Doc. #401941317 was for final reclamation of only the Bears 4-30 wellsite as the Bears 5-30 and combined tank battery were still in operation when the Bears 4-30 was plugged.

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

Print Name: Kevin Kane

Signed: _____

Title: Operations Manager

Date: 9/6/2019 7:51:30 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>
402165778	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files