

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402504624

Date Received:

10/07/2020

FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

1 of 2 CAs from the FIR responded to on this Form

0 CA Completed
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 47120
Name of Operator: KERR MCGEE OIL & GAS ONSHORE LP
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779
Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Toni Newville</u>	<u>303-888-6820</u>	<u>Toni_Newville@Oxy.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 697502026
Inspection Date: 09/18/2020 FIR Submit Date: 10/01/2020 FIR Status: _____

Inspected Operator Information:

Company Name: KERR MCGEE OIL & GAS ONSHORE LP Company Number: 47120
Address: P O BOX 173779
City: DENVER State: CO Zip: 80217-3779

LOCATION - Location ID: 336346

Location Name: DOUTHIT-63N68W Number: 26NENE County: _____
Qtrqr: NENE Sec: 26 Twp: 3N Range: 68W Meridian: 6
Latitude: 40.201090 Longitude: -104.965010

FACILITY - API Number: 05-123- -00 Facility ID: 336346

Facility Name: DOUTHIT-63N68W Number: 26NENE
Qtrqr: NENE Sec: 26 Twp: 3N Range: 68W Meridian: 6
Latitude: 40.201090 Longitude: -104.965010

CORRECTIVE ACTIONS:

1 ☒ CA# 142483

Corrective Action: Comply with Rule 1105. This might be referred to Enforcement; therefore, there is no corrective action date. Operator should conduct the corrective action as soon as possible.

Date: _____

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment belongs to the surface owner

Operator Comment: The equipment identified in the photo is a domestic tap adjacent to a private outbuilding. It is not an off-location flowline and is not subject to Abandonment under the 1105 series regulations. Furthermore, Kerr-McGee maintains it is the Lessor and their successors and assigns sole responsibility for Lessor's domestic tap riser pursuant to the express language in the governing Oil and Gas Lease which states: "Lessor shall have the

privilege at his own risk and expense of using gas from any gas well on said land...by making his own connections thereto." Given the unequivocal language in the lease, it is the Lessor and their successors and assigns responsibility to maintain and/or remove the line. Kerr-McGee confirms it abandoned the tap's connection to the Douthit 8-26 well in November 2018.

COGCC Decision: **Not Approved**

COGCC Representative: The equipment identified in Photo 12 was related to a nearby well that was plugged and abandoned in 2020. Per Rule 1004.a., all equipment shall be removed within three months of plugging a well. It has been over three months since plugging operations were completed and is currently out of compliance. Operator shall conduct the corrective action as soon as possible.

COGCC Supervisor: The equipment identified in Photo 12 was related to a nearby well that was plugged and abandoned in 2020. Per Rule 1004.a., all equipment shall be removed within three months of plugging a well. It has been over three months since plugging operations were completed and is currently out of compliance. Operator shall conduct the corrective action as soon as possible.

OPERATOR COMMENT AND SUBMITTAL

Comment: The equipment identified in the photo is a domestic tap adjacent to a private outbuilding. It is not an off-location flowline and is not subject to Abandonment under the 1105 series regulations. Furthermore, Kerr-McGee maintains it is the Lessor and their successors and assigns sole responsibility for Lessor's domestic tap riser pursuant to the express language in the governing Oil and Gas Lease which states: "Lessor shall have the privilege at his own risk and expense of using gas from any gas well on said land...by making his own connections thereto." Given the unequivocal language in the lease, it is the Lessor and their successors and assigns responsibility to maintain and/or remove the line. Kerr-McGee confirms it abandoned the tap's connection to the Douthit 8-26 well in November 2018.

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

Print Name: Callie Fiddes

Signed: _____

Title: Regulatory Analyst

Date: 10/7/2020 10:57:26 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>
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402504624	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files