

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402544631

Date Received:
12/02/2020

FIR RESOLUTION FORM

Overall Status: FRQ

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: 10456

Name of Operator: CAERUS PICEANCE LLC

Address: 1001 17TH STREET #1600

City: DENVER State: CO Zip: 80202

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Romana Cowden</u>	<u>720-951-5895</u>	<u>cogcc.inspections@caerusoilandgas.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 701100824

Inspection Date: 11/30/2020

FIR Submit Date: 11/30/2020

FIR Status: _____

Inspected Operator Information:

Company Name: CAERUS PICEANCE LLC

Company Number: 10456

Address: 1001 17TH STREET #1600

City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 324395

Location Name: PUCKETT-67S97W Number: 1SESW County: _____

Qtrqtr: SESW Sec: 1 Twp: 7S Range: 97W Meridian: 6

Latitude: 39.469580 Longitude: -108.170940

FACILITY - API Number: 05-045- -00 Facility ID: 324395

Facility Name: PUCKETT-67S97W Number: 1SESW

Qtrqtr: SESW Sec: 1 Twp: 7S Range: 97W Meridian: 6

Latitude: 39.469580 Longitude: -108.170940

CORRECTIVE ACTIONS:

1 CA# 144740

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 12/15/2020

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

Operator Comment: Some level of rutting is normal wear and tear during active snow melt/wet conditions. Location and access road are stabilized unpaved surfaces (graveled and compacted), which are inspected regularly and maintained as needed. An annual environmental inspection is also completed and document every year by environmental staff, and stormwater BMPs are inspected in that process (see file attachment for documentation of this inspection). In August 2020, when the inspection was completed prior to snow fall, the road was in good condition. It is not

feasible to grade the road during snowmelt or wet conditions, because heavy equipment would further damage the road. Rule 1002.f(2)F states 'Vehicle tracking control practices to control potential sediment discharges from operational roads, well pads, and other unpaved surfaces. Practices include road and pad design and maintenance to minimize rutting and tracking, controlling site access, street sweeping or scraping, tracking pads, wash racks, education, or other sediment controls'. Based on our annual inspection, which occurred when conditions were dry, Caerus believes we have met the intent of this rule. Furthermore Caerus does not believe it would be a good practice to bring heavy equipment to the location while the soil is wet.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor:

Photo log document 701100825 shows no stabilization or tracking controls on location 324395.

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: Romana Cowden

Signed:

Title: EHS

Date: 12/2/2020 11:32:25 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>
402544631	FIR RESOLUTION SUBMITTED
402544640	Annual Inspection SW Question

Total Attach: 2 Files