

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402712705

Date Received:  
06/14/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

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

1 CA Completed  
0 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

Kellerby, Shaun

shaun.kellerby@state.co.us

.SG Interests

inspection@sginterests.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 699803170

Inspection Date: 05/28/2021

FIR Submit Date: 05/28/2021

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: 311729

Location Name: FALCON SEABOARD-611S90W Number: 12SWNW County: \_\_\_\_\_

Qtrqtr: SWN Sec: 12 Twp: 11S Range: 90W Meridian: 6  
W

Latitude: 39.118231 Longitude: -107.402431

FACILITY - API Number: 05-051- -00 Facility ID: 311729

Facility Name: FALCON SEABOARD-611S90W Number: 12SWNW

Qtrqtr: SWN Sec: 12 Twp: 11S Range: 90W Meridian: 6  
W

Latitude: 39.118231 Longitude: -107.402431

CORRECTIVE ACTIONS:

1 ☒ CA# 151524

Corrective Action: Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations.

Date: 06/12/2021

Response: CA COMPLETED

Date of Completion: 06/03/2021

Vehicle tracking control is a control measure that consists of a stabilized layer of aggregate, or a pre-fabricated

Operator  
Comment:

structure, which is used to minimize tracking of sediments from the construction site (exposed soil) to paved road surface. Tracking pads or other tracking prevention devices are utilized and necessary where tracking is actually occurring.

Inspection Doc. #699803172 and #699803170 do not indicate or claim that any tracking of any material or sediment off the Falcon Seaboard 11-90-12 #1 and #1A location is occurring, or has occurred. In addition, the photos attached to the inspection documents do not show any tracking of any material or sediment off the locations.

The inspection photos (attached) do not show the approximate 320' rocked access road that any vehicle must cross after leaving the well pad surfaces, and prior to entrance onto the private ranch road. This 320' access road has functioned as an effective tracking prevention device since the well pad was constructed in 2006.

The Falcon Seaboard 11-90-12 #1 and #1A pad surfaces are covered with rock, and have been since their construction in 2006.

The areas shown in the inspection photos, where minor "rutting" is shown is more than, 350'-400' (across rocked well pad surface and rocked access road) from the entrance onto the private ranch road.

Any vehicle causing the minor rutting shown in the inspection photos would have traveled approximately 350'-400' (driving distance) over the rocked pad surface and rocked access road, prior to arriving at the rocked private ranch road. Traveling across this approximate 400' of rocked area has acted, and continues to function, as an effective tracking device.

The requirement (corrective action) of placing a tracking device where no tracking is occurring, and has not occurred over the life of the well pad is nonsensical. Such a requirement would be similar to requiring tank containment on a well pad that does not have tanks with fluids to contain. The COGCC's adopted Statement of Basis, Specific Statutory Authority, and Purpose does not in any way require operators to implement solutions to issues or problems that do not exist.

No portion of the Falcon Seaboard 11-90-12 #1 or #1A well pads lack stabilization, or are otherwise unstable. These pads have been stable for at least more than a decade.

The areas of the pad shown in photo # 3977 and #3978 could be considered to be "rutted," but these photos do not indicate that the well pad "lacks stabilization." Minor rutting is common and expected as a result of vehicles driving across well pad surfaces after a rain or moisture event. Such rutting does not in any way support a claim that the well pad "lacks stabilization."

To address the minor rutting, SG placed approximately 10 yards of 3" minus rock on in the areas where rutting is shown (see attached photos).

COGCC Decision: Approved pending re-inspection

COGCC  
Representative:

#### 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: Eric Sanford

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

Title: Land

Date: 6/14/2021 9:55:25 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>
402712705	FIR RESOLUTION SUBMITTED
402714278	Gravel
402714281	Gravel
402714283	Gravel
402714290	FSB 12-1 Inspection Photos
402714296	FSB 12-1A Inspection Photos

Total Attach: 6 Files