

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402707333

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
.		inspection@sginterests.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 696201334

Inspection Date: 05/26/2020

FIR Submit Date: 05/29/2020

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: _____

Qtrqr: NESW Sec: 18 Twp: 11s Range: 89w Meridian: 6

Latitude: 39.098370 Longitude: -107.380760

FACILITY - API Number: 05-051-00 Facility ID: 414132

Facility Name: Cow Skull 11-89-18 Number: 1

Qtrqr: NESW Sec: 18 Twp: 11s Range: 89w Meridian: 6

Latitude: 39.098370 Longitude: -107.380760

CORRECTIVE ACTIONS:

1 CA# 139406

Corrective Action: Install or repair required BMPs in accordance with good engineering practices; Maintain BMPs in proper functioning condition; Continue stormwater management until Location receives a passing final reclamation inspection, pursuant to Rule 1002.f

Date: 06/13/2020

Response: CA COMPLETED

Date of Completion: 06/02/2021

Operator Comment: SG continues to conduct maintenance tasks and repairs in an ongoing effort to meet the COGCC inspector's standards. SG believes the most recent repairs to the BMPs and work to reduce the size of the well pad surface will place this location in compliance with the COGCC Rules. The current Corrective Action (CA) list from the latest inspection report contains 10-15 different action items within this single CA. In addition, the list of CA's changes with each inspection. Regardless of the moving compliance target, the majority of these action items within the one CA are complete. This includes items such as fill slope stabilization, drain pipe maintenance, rock

run down maintenance, silt trap maintenance, seeding and mulching, etc. Long term BMP planning for the cut slopes is underway and being scheduled. There is no sediment leaving the location and all sediment loading is minimized as required in the Rule, and described in the 2008 Statement of Basis and Purpose. The CA to implement Rule 1002f.(2).C states "designed to minimize erosion from unpaved areas". SG believes the key words here are "from" and "minimize." SG's recent work to this well pad is designed and constructed to "minimize" erosion "from" the disturbed areas of the well pad.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved"; Inspection #696202828 on 6/15/2021 documented that stormwater corrective actions not have been addressed; corrective action remains applicable. In addition, the FIRR, Corrective action complete section, is not a forum for operators to disagree/argue with the corrective actions.

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 10:00:01 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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402707333	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files