

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:  
403302335

Date Received:  
01/25/2023

**FIR RESOLUTION FORM**

Overall Status: CAC

CA Summary:

3 of 3 CAs from the FIR responded to on this Form

3 CA Completed  
0 Factual Review Request

**OPERATOR INFORMATION**

OGCC Operator Number: 81490  
Name of Operator: ST CROIX OPERATING INC  
Address: P O BOX 13799  
City: DENVER State: CO Zip: 80201

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Melnychenko, Paul</u>	<u>(303) 489-9298</u>	<u>stcroixexp@aol.com</u>
<u>Andy Peterson</u>	<u>970-203-4263</u>	<u>Andy@PEOperating.com</u>
<u>Ryan Dornbos</u>		<u>Ryan@PEOperating.com</u>
<u>Arthur, Denise</u>		<u>denise.arthur@state.co.us</u>

**COGCC INSPECTION SUMMARY:**

FIR Document Number: 696105675  
Inspection Date: 01/09/2023 FIR Submit Date: 01/17/2023 FIR Status: \_\_\_\_\_

**Inspected Operator Information:**

Company Name: ST CROIX OPERATING INC Company Number: 81490  
Address: P O BOX 13799  
City: DENVER State: CO Zip: 80201

**LOCATION** - Location ID: 482780

Location Name: Horseshoe Number: 1 County: \_\_\_\_\_  
Qtrqr: NENE Sec: 27 Twp: 3S Range: 49W Meridian: 6  
Latitude: 39.768700 Longitude: -102.843070

**FACILITY** - API Number: 05-121-00 Facility ID: 482780

Facility Name: Horseshoe Number: 1  
Qtrqr: NENE Sec: 27 Twp: 3S Range: 49W Meridian: 6  
Latitude: 39.768700 Longitude: -102.843070

**CORRECTIVE ACTIONS:**

1  CA# 167022

Corrective Action:

Date: 01/24/2023

Operator shall submit results from soil pits and proposed soil sample sites as described in Topsoil sampling map (Doc #402948673; page 6) to determine and evaluate topsoil depths as measured in the field. Additionally, Operator shall provide documentation for the quantity/volume of all topsoil salvaged during the construction phase of this location to ensure compliance with topsoil salvage requirements.

Submittal of this information does not indicate compliance with the topsoil salvage requirement of Rule 1002.b.

Response: CA COMPLETED

Date of Completion: 01/09/2023

Operator Comment: St. Croix stripped and stockpiled the top 6' from the 300'x300' working pad surface per the submitted topsoil protection plan. 1,667 yards of topsoil were stockpiled. The soil sampling referenced in Doc #402948673, pg 6, is described in the attached reclamation plan.

COGCC Decision: **Not Approved**

COGCC Representative: This corrective action has not been completed and is not approved. In page one (1) of the Topsoil Protection Plan (Doc #402948673), it states that 3,148 cubic yards of topsoil would be salvaged from the oil and gas location; Operator's response in this FIRR indicate 1,667 yards of topsoil were removed (see Operator Comment). Additionally, the Operator submitted (via this FIRR) agronomic soil properties from the location, rather than topsoil depths from the soil pits as described in the Topsoil Protection Plan and as required by this corrective action.

**2**  CA# 167023

Corrective Action: Comply with Rule 1002.c. Corrective action date is the date the location was observed out of compliance.

Date: 01/09/2023

Response: CA COMPLETED

Date of Completion: 01/09/2023

Operator Comment: The site was adequately protected against wind and water erosion at all times. There is no evidence that any soils exited the site due to either wind or water erosion. The location has seen three significant snow storms since construction began. Runoff from these storms has not caused any off-location sediment transfer. This location will not be receiving any significant rain events during the period between construction and conclusion of reclamation. At present, the topsoil piles are frozen. Neither wind or water erosion will be occurring.

COGCC Decision: **Not Approved**

COGCC Representative: This corrective action has not been completed and is not approved. During the previous inspection (Doc #696105675) no evidence of temporary BMPs (e.g. equipment tracking) were observed on any soil stockpiles and stockpiles were comprised of unconsolidated material. Unconsolidated material can be a potential pollutant source as it is not stabilized.

**3**  CA# 167024

Corrective Action: Immediately install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices.

Date: 01/09/2023

The corrective date is not intended to be the date for which the Operator shall complete the corrective actions but rather the corrective date is the date the location was observed out of compliance, as it should be in compliance at all times.

Response: CA COMPLETED

Date of Completion: 01/09/2023

Operator Comment: BMPs (ditch, berm, track packing) were constructed from salvaged topsoil and were taken down in part as necessary to return the topsoil to its original location. Reclamation will be concluded prior to soils thawing. Soil transport off location has not and will not occur due to frozen soils and low slope angle on this site.

COGCC Decision: **Not Approved**

COGCC Representative: This corrective action has not been completed and is not approved. Stormwater and erosion control BMPs shall be implemented until final reclamation has been achieved pursuant to Rule 1004.

**OPERATOR COMMENT AND SUBMITTAL**

Comment: The Horseshoe #1 well had a short duration drilling period and was drilled and abandoned. St. Croix plans to conclude reclamation activities by returning the topsoil to its original location and reseeding as soon as weather permits.

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

Print Name: Ryan Dornbos

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

Title: Petroleum Engineer

Date: 1/25/2023 4:44:13 PM

### ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b>Document Number</b>	<b>Description</b>
403302335	FIR RESOLUTION SUBMITTED
403302362	Topsoil Plan

Total Attach: 2 Files