

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403526817

Date Received:
09/14/2023

FIR RESOLUTION FORM

Overall Status: BOTH

CA Summary:

6 of 6 CAs from the FIR responded to on this Form

2 CA Completed
4 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 98220

Name of Operator: YOUNG GAS STORAGE COMPANY LTD

Address: P O BOX 1087

City: COLORADO SPGS State: CO Zip: 80944

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name

Phone

Email

TRINKO, ANTHONY

logan.hansen@state.co.us

anthony_trinko@kindermorgan.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 708200541

Inspection Date: 09/05/2023

FIR Submit Date: 09/08/2023

FIR Status: _____

Inspected Operator Information:

Company Name: YOUNG GAS STORAGE COMPANY LTD

Company Number: 98220

Address: P O BOX 1087

City: COLORADO SPGS State: CO Zip: 80944

LOCATION - Location ID: 313960

Location Name: YOUNG-64N58W Number: 11NENE County: _____

Qtrqtr: NENE Sec: 11 Twp: 4N Range: 58W Meridian: 6

Latitude: 40.331720 Longitude: -103.832950

FACILITY - API Number: 05-087-00 Facility ID: 313960

Facility Name: YOUNG-64N58W Number: 11NENE

Qtrqtr: NENE Sec: 11 Twp: 4N Range: 58W Meridian: 6

Latitude: 40.331720 Longitude: -103.832950

CORRECTIVE ACTIONS:

1 ☒ CA# 180591

Corrective Action: Comply with Rule 606 and remove debris. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: FACTUAL REVIEW REQUEST

Basis for Review: Operator does not own or operate the location

Operator Comment: Young's response to FIR Document Number 708200541 is attached to this document.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules. Operator indicated that debris has been removed.

COGCC Supervisor: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules. Operator indicated that debris has been removed.

2 ☒ CA# 180592

Corrective Action: Install or repair wildlife protection equipment per Rule 902.b. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: CA COMPLETED Date of Completion: 09/12/2023

Operator Comment: Young installed netting over the secondary containment on September 12, 2023.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection. Based on photo documentation provided, work to address the corrective action appears to have been performed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules.

3 ☒ CA# 180593

Corrective Action: Install sign to comply with Rule 605.g. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: CA COMPLETED Date of Completion: 09/12/2023

Operator Comment: Young installed a new label on the day tank in addition to a new NFPA label on the other tank. See attached document.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection. Based on photo documentation provided, work to address the corrective action appears to have been performed. A field inspection will be conducted at a future date to evaluate compliance with ECMC rules.

4 ☒ CA# 180594

Corrective Action: Comply with Rule 606 and remove any unused equipment. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: FACTUAL REVIEW REQUEST

Basis for Review: Equipment belongs to the surface owner

Operator Comment: The concrete structures are outside of the fenced area for the well and belong to the landowner. Young does not have the legal right to remove them.

COGCC Decision: Not Approved

COGCC Representative: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed. Work with the surface owner to remove unused equipment that is on location.

COGCC Supervisor: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed. Work with the surface owner to remove unused equipment that is on location.

5 ☒ CA# 180595

Corrective Action: Comply with Rule 1003. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: FACTUAL REVIEW REQUEST

Basis for Review: Operator does not own or operate the location

Operator Comment: The alleged weeds are outside of the fence line of the area controlled and operated by Young and on land owned and controlled by the third-party landowner.

COGCC Decision: **Not Approved**

COGCC Representative: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed, per the 1000 Series Rules.

COGCC Supervisor: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed, per the 1000 Series Rules.

6  CA# 180596

Corrective Action: Comply with Rule 1002.f. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/05/2023

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: In addition to the fact that ECMC's regulations are preempted by federal law as described above, natural gas transmission and storage facilities are also exempt from Clean Water Act stormwater requirements and therefore Rule 1002.f does not apply for that additional reason. 33 U.S.C.S 1341(l)(2).

COGCC Decision: **Not Approved**

COGCC Representative: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed, per the 1000 Series Rules.

COGCC Supervisor: The inspection corrective actions do not relate to the operations at the wellbore. The location will remain out of compliance until the corrective action has been completed, per the 1000 Series Rules.

OPERATOR COMMENT AND SUBMITTAL

Comment: Young's response to FIR Document Number 708200541 is attached to this document.

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

Print Name: Anthony P. Trinko

Signed: _____

Title: Sr. Reservoir Engineer

Date: 9/14/2023 4:44:26 PM

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>
403526817	FIR RESOLUTION SUBMITTED
403530862	Young's Response to FIR Document #7082000541

Total Attach: 2 Files