

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403658436

Date Received:

01/18/2024

## FIR RESOLUTION FORM

Overall Status: FRQ

CA Summary:

2 of 5 CAs from the FIR responded to on this Form

0 CA Completed  
2 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

Romana Cowden

Phone

720-951-5895

Email

COGCC.inspections@caerusoilandgas.com

### COGCC INSPECTION SUMMARY:

FIR Document Number: 696205515

Inspection Date: 01/05/2024

FIR Submit Date: 01/10/2024

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: 334617

Location Name: PARKER RANCH-67S93W Number: 15SENE County: \_\_\_\_\_

Qtrqtr: SENE Sec: 15 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.445740 Longitude: -107.755900

### FACILITY - API Number: 05-045-00 Facility ID: 334617

Facility Name: PARKER RANCH-67S93W Number: 15SENE

Qtrqtr: SENE Sec: 15 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.445740 Longitude: -107.755900

### CORRECTIVE ACTIONS:

3 CA# 189967

Corrective Action: Comply with 606 Rules

Date: 01/05/2024

Response: FACTUAL REVIEW REQUEST

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

Operator Comment: Line with risers is live and needed. Drum and catch are needed and in use. They are used to remove gravel from containments that are pulled. Gravel must be filtered out before fluids can be disposed of. The drum contains gravel from filter pod.

COGCC Decision: **Not Approved**

COGCC Representative:	<p>Operator's basis for review "Action requested was already completed prior to the inspection".</p> <p>Factual Review request regarding corrective action to remove unused pipe riser equipment is not approved and Operator's basis for review does not apply. The corrective action was a requirement to remove the unused pipe riser equipment, not the active line; the requirement for removal of the unused riser equipment remains applicable.</p> <p>The portion of this review regarding the "drum and catch" is approved; the corrective action regarding the requirement to remove "drum and catch" equipment will no longer be applicable.</p>
COGCC Supervisor:	<p>Operator's basis for review "Action requested was already completed prior to the inspection".</p> <p>Factual Review request regarding corrective action to remove unused pipe riser equipment is not approved and Operator's basis for review does not apply. The corrective action was a requirement to remove the unused pipe riser equipment, not the active line; the requirement for removal of the unused riser equipment remains applicable.</p> <p>The portion of this review regarding the "drum and catch" is approved; the corrective action regarding the requirement to remove "drum and catch" equipment will no longer be applicable.</p>

4  CA# 189968

Corrective Action: Comply with 1003 Rules.

Date: 01/05/2024

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: This location is in compliance with Rule 1003. There are no living weeds or erosion present. Thinly vegetative areas are common in this plant community. Furthermore, the ground is frozen and it is not practicable, necessary or reasonable to do any additional seeding at this time; a corrective action date of 1/05/2024 is impractical.

COGCC Decision: **Not Approved**

COGCC Representative: It is clear from the corrective action comment that the expectation was that the reclamation work would be conducted during the 2024 growing season. Weeds present in the photograph are examples representing unmanaged weeds on the Location.

Comment copied from FIR #696205515: "the slopes on the east end of the Location are not progressing towards a uniform, desirable perennial vegetative establishment pursuant to 1003 Rules. Additional reclamation efforts during the 2024 growing season will be required within these areas".

As documented, the Location is not in compliance with 1003 requirements. Additionally, as stated within the Field Inspection Report, the "date of discovery" is given for all new corrective action dates. It is ECMC's expectation that Operators are in compliance with ECMC rules at all times. Therefore, the date the location was observed out of compliance is given as the corrective action date. Location will remain out of compliance until corrective actions are addressed.

COGCC Supervisor: It is clear from the corrective action comment that the expectation was that the reclamation work would be conducted during the 2024 growing season. Weeds present in the photograph are examples representing unmanaged weeds on the Location.

Comment copied from FIR #696205515: "the slopes on the east end of the Location are not progressing towards a uniform, desirable perennial vegetative establishment pursuant to 1003 Rules. Additional reclamation efforts during the 2024 growing season will be required within these areas".

As documented, the Location is not in compliance with 1003 requirements. Additionally, as stated within the Field Inspection Report, the "date of discovery" is given for all new corrective action dates. It is ECMC's expectation that Operators are in compliance with ECMC rules at all times. Therefore, the date the location was observed out of compliance is given as the corrective action date. Location will remain out of compliance until corrective actions are addressed.

#### 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: \_\_\_\_\_

**ATTACHMENT LIST**

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

<b><u>Document Number</u></b>	<b><u>Description</u></b>
403658436	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files