

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:
403614554

Date Received:
12/05/2023

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: 10766
Name of Operator: ARKOMA OPERATIONS LLC
Address: 2121 S COLUMBIA AVE SUITE 101
City: TULSA State: OK Zip: 74114

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Price, Andrew</u>	<u>918-260-8324</u>	<u>aprice@arkomaops.com</u>
<u>.General</u>		<u>SJBcompliance@arkomaops.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 714000107
Inspection Date: 11/01/2023 FIR Submit Date: 11/17/2023 FIR Status: _____

Inspected Operator Information:

Company Name: ARKOMA OPERATIONS LLC Company Number: 10766
Address: 2121 S COLUMBIA AVE SUITE 101
City: TULSA State: OK Zip: 74114

LOCATION - Location ID: 333602

Location Name: OLSON-SMITH UNIT-N33N8W Number: 8SESE County: _____
Qtrqtr: SESE Sec: 8 Twp: 33N Range: 8W Meridian: N
Latitude: 37.114019 Longitude: -107.735344

FACILITY - API Number: 05-067-00 Facility ID: 333602

Facility Name: OLSON-SMITH UNIT-N33N8W Number: 8SESE
Qtrqtr: SESE Sec: 8 Twp: 33N Range: 8W Meridian: N
Latitude: 37.114019 Longitude: -107.735344

CORRECTIVE ACTIONS:

1 CA# 188335

Corrective Action: Comply with Rule 1004.a to remove (regardless of ownership) all debris, abandoned gathering line risers, flowline risers, and equipment within three months of plugging (5/9/2017) the associated facility. Date: 08/19/2019

Response: CA COMPLETED Date of Completion: 12/04/2023

Operator Comment: We are actively working this project but have questions on existing piping that is likely Red Cedar's as well as trying to locate documentation on surface use agreements to determine the area that needs reclaimed.
We are sorry that this work has gone undone under our watch since we took over from Catamount in April 2021.

We were not aware of the project at the time of the transfer of assets.

COGCC Decision: **Not Approved**

COGCC Representative: While the ECMC appreciates Operator's notice, Operator's response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments corrective action does not appear to have been completed; Original corrective action and date remains applicable.

2  CA# 188336

Corrective Action: Comply with Rule 1004. Reseed disturbance areas using a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil. Operator shall continue to monitor and manage this site until the location meets Rule 1004 standards, including stormwater and weed management.

Date: 11/01/2023

Response: CA COMPLETED Date of Completion: 12/04/2023

Operator Comment: We are actively working this project but have questions on existing piping that is likely Red Cedar's as well as trying to locate documentation on surface use agreements to determine the area that needs reclaimed.
We are sorry that this work has gone undone under our watch since we took over from Catamount in April 2021. We were not aware of the project at the time of the transfer of assets.

COGCC Decision: **Not Approved**

COGCC Representative: While the ECMC appreciates Operator's notice, Operator's response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments corrective action does not appear to have been completed; Original corrective action and date remains applicable.

3  CA# 188337

Corrective Action: Comply with rule 1004.

Date: 11/01/2023

Response: CA COMPLETED Date of Completion: 12/04/2023

Operator Comment: We are actively working this project but have questions on existing piping that is likely Red Cedar's as well as trying to locate documentation on surface use agreements to determine the area that needs reclaimed.
We are sorry that this work has gone undone under our watch since we took over from Catamount in April 2021. We were not aware of the project at the time of the transfer of assets.

COGCC Decision: **Not Approved**

COGCC Representative: While the ECMC appreciates Operator's notice, Operator's response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments corrective action does not appear to have been completed; Original corrective action and date remains applicable.

OPERATOR COMMENT AND SUBMITTAL

Comment: We are actively working this project but have questions on existing piping that is likely Red Cedar's as well as trying to locate documentation on surface use agreements to determine the area that needs reclaimed.
We are sorry that this work has gone undone under our watch since we took over from Catamount in April 2021. We were not aware of the project at the time of the transfer of assets.

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

Print Name: Jaime Pugh Signed: _____
Title: Engineering Analyst Date: 12/5/2023 7:36:05 AM

ATTACHMENT LIST

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

Document Number	Description
403614554	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files