

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403250875

Date Received:
12/06/2022

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

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

2 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10673

Name of Operator: GADECO LLC

Address: 7535 EAST HAMPDEN AVE STE 400

City: DENVER State: CO Zip: 80231

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Kraich, Adam</u>		<u>adam.kraich@state.co.us</u>
<u>Petrie, Erica</u>		<u>erica.petrie@state.co.us</u>
		<u>trent@gfccap.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 697504383

Inspection Date: 11/23/2022

FIR Submit Date: 11/23/2022

FIR Status: _____

Inspected Operator Information:

Company Name: GADECO LLC

Company Number: 10673

Address: 7535 EAST HAMPDEN AVE STE 400

City: DENVER State: CO Zip: 80231

LOCATION - Location ID: 317527

Location Name: GRAEFE-69N62W Number: 26SWNW County: _____

Qtrqr: SWN Sec: 26 Twp: 9N Range: 62W Meridian: 6

W

Latitude: 40.720843 Longitude: -104.294569

FACILITY - API Number: 05-123-00 Facility ID: 317527

Facility Name: GRAEFE-69N62W Number: 26SWNW

Qtrqr: SWN Sec: 26 Twp: 9N Range: 62W Meridian: 6

W

Latitude: 40.720843 Longitude: -104.294569

CORRECTIVE ACTIONS:

1 CA# 166270

Corrective Action:

Date: 11/08/2022

Perform reclamation in accordance to Rule 1003.b. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

The corrective date is the date the location was observed out of compliance. Interim reclamation activities shall be completed as soon as possible as this location is over 2 years out of compliance.

Response: CA COMPLETED

Date of Completion: 12/04/2022

Operator Comment: Discussed inspection report with Land owner who wishes to defer reseeding (location was reseeded in 2021) until after the nearby Croissant #4 surface location is reclaimed and the Graefe #1 production facility is built. Lan owner doesn't want additional erosional controls but GADECO will install straw wattles following reseeding operations. Land owner also wishes to defer reseeding of location until spring of 2023 at the earliest.

COGCC Decision: Approved pending re-inspection

COGCC Representative: COGCC Staff appreciates the consultation with the surface owner but the surface owner cannot dictate or waive COGCC corrective actions. Stormwater BMPs need to address both stormwater and wind erosion. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards. COGCC Staff approves reseeding of the location for spring 2023.

Operator shall email Chris Binschus (chris.binschus@state.co.us) the timeline for the completion of the Croissant #4 reclamation and the completion of the Graefe #1 production facility build.

2 CA# 166271

Corrective Action: Operator shall ensure erosion controls are implemented to stabilize the seeded soil upon competition of interim reclamation.

Date: 11/08/2022

The corrective date is the date the location was observed out of compliance.

Response: CA COMPLETED

Date of Completion: 12/04/2022

Operator Comment: Discussed corrective actions with land owner who wants to defer any reseeding until after the nearby well location is reclaimed and a production facility constructed. Also does not see the need for erosional controls but agreed to straw wattles following reseeding in the spring of 2023 at the earliest.

COGCC Decision: Approved pending re-inspection

COGCC Representative: COGCC Staff appreciates the consultation with the surface owner but the surface owner cannot dictate or waive COGCC corrective actions. Stormwater BMPs need to address both stormwater and wind erosion. A field inspection will be conducted at a future date to evaluate compliance with COGCC standards. COGCC Staff approves reseeding of the location for spring 2023.

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: Trent W Green

Signed: _____

Title: Managing Director

Date: 12/6/2022 10:50:42 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>
403250875	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files