



May 25, 2018

Colorado Department of Public Health and Environment  
Air Pollution Control Division, APCD-SS-B1  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530

Re: 2017 Annual Leak Detection and Repair (LDAR) Report  
St. Croix Operating Inc.  
P.O. Box 13799  
Denver, Colorado 80403

To Whom It May Concern:

On behalf of St. Croix Operating Inc. (St. Croix), CGRS Inc. herein submits the 2017 Annual Leak Detection and Repair (LDAR) Report as required by Colorado Regulation 7, Section XVII.F.9. Included with this letter is the requisite Annual Report Form, quantifying all of the LDAR inspections performed at facilities that were subject to Regulation 7, Section XVII.F in 2017. The leaks identified and subsequently repaired or on delay at the inspected facilities during this reporting period are listed in Section 3, as required in Regulation 7, Section XVII.F.9.

If you have any questions or concerns regarding the attached 2017 Annual LDAR Report, please call me at (800) 288-2657.

Sincerely,

A handwritten signature in black ink that reads "Steve Warner". The signature is written in a cursive, slightly slanted style.

**Steven J. Warner**  
CGRS, Inc.  
Project Engineer

Enclosures:

- 2017 CDPHE Annual Leak Detection and Repair (LDAR) Report Form

# Leak Detection and Repair (LDAR) Annual Report Form<sup>1</sup>



Please submit via email to: [cdphe\\_reg7LDAR\\_annualreports@state.co.us](mailto:cdphe_reg7LDAR_annualreports@state.co.us)

## Section 1: General Information

Company Name:	St. Croix Operating, Inc.		
Inspection Year:	2017	# Facilities Inspected: <sup>2</sup>	3
Contact Person:	Paul Melnychenko	Title:	President
Phone Number:	303-595-4597	E-mail Address:	<a href="mailto:paul@stcroixexp.com">paul@stcroixexp.com</a>

## Section 2: LDAR Inspections

Inspection Method	# Inspections <sup>3</sup>
AIMM at Natural Gas Compressor Stations:	N/A
AIMM at Well Production Facilities:	0
AVO at Well Production Facilities:	27
<b>TOTAL</b>	<b>27</b>

## Section 3: Leaking Components Details

Component Type	# Leaks Identified <sup>4</sup>	# Leaks Repaired	# Leaks on Delay of Repair List as of Dec 31
Valves:	0	0	0
Connectors:	0	0	0
Flanges:	0	0	0
Pump Seals:	0	0	0
Pressure Relief Devices:	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>

## Section 4: Responsible Official Certification

All information contained in the LDAR Annual Report must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section 1.B.38.

Please note the Colorado Statutes state that any person who knowingly, as defined in §18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of §25-7 122.1, C.R.S.

I, the Responsible Official, have reviewed this annual report in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this report are true, accurate and complete.

Printed/Typed Name - Responsible Official:	Title:
Paul Melnychenko	President
Signature:	Date:
	5-25-2018

Section 5: Additional Notes

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Section 6: Facilities Inspected

Addendum Table 1		
Plant AIRS ID (e.g., 123/7896)	Location (e.g., Lat/Long)	Facility Name
Not Required	Not Required	Not Required

## Footnotes:

<sup>1</sup> The fields shaded in blue are mandatory required elements of the annual report. The remaining information is voluntary and requested to help the Division better interpret the implementation of the leak detection and repair program.

<sup>2</sup> "# of Facilities Inspected" should reflect the total number of unique physical locations (e.g. well production facilities and natural gas compressor stations) inspected during the calendar year reported.

<sup>3</sup> The "Total # of Inspections" should reflect the number of unique facility inspections events (e.g. unique complete facility AVO and AIMM events) that occurred across all facilities (as reflected in Section 1) monitored by the company during the calendar year reporting period. This number should not reflect a count representing the number of individual component(s) monitored. In addition, re-monitoring events to verify an earlier identified leak has been repaired as required by Regulation 7, Section XVII.F.7 should not be counted in the "Total # of Inspections" reported.

<sup>4</sup> The "# of Leaks Identified" should reflect the sum total of component leaks identified during all facility inspections (e.g. AVO and AIMM) that occurred during the calendar year reported.