

**FORM  
INSP**Rev  
05/11**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

DE	ET	OE	ES
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Inspection Date:  
10/30/2014Document Number:  
673501818

Overall Inspection:

**ACTION REQUIRED****FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	211829	333348	COSTA, RYAN	<input type="checkbox"/>	

**Operator Information:**OGCC Operator Number: 66561Name of Operator: OXY USA INCAddress: PO BOX 27757City: HOUSTON State: TX Zip: 77227

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☒ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

Contact Name	Phone	Email	Comment
Montgomery, Kelley		Kelley_Montgomery@oxy.com	
Proulx, Joan	(970) 263-3641	joan_proulx@oxy.com	All Inspections
Sonnier, Brent	(713) 366-3640/ (303) 885-2786	Brent_Sonnier@oxy.com	All Inspections Southeast

**Compliance Summary:**QtrQtr: SESE Sec: 15 Twp: 27S Range: 70W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/27/2014	668002525	PR	PR	SATISFACTORY	P		No
06/26/2012	668000326	PR	PR	SATISFACTORY			No
09/19/2011	200323071	PR	PR	SATISFACTORY			No
04/25/2011	200308939	PR	PR	SATISFACTORY			No
05/27/2010	200254444	PR	PR	SATISFACTORY			No
06/01/2009	200212368	PR	PR	SATISFACTORY			No
08/14/2008	200194258	PR	PR	SATISFACTORY			No
07/19/2007	200116097	PR	PR	SATISFACTORY		Pass	No
07/11/2005	200078434	PR	PR	SATISFACTORY		Pass	No
03/19/2002	200025096	PR	PR	SATISFACTORY		Pass	No
08/31/1999	500143346	PR	PR			Pass	No
09/11/1996	500143345	PR	PR			Pass	No
04/17/1995	500143344	PR	PR				

**Inspector Comment:****RECLAMATION/STORMWATER INSPECTION****Related Facilities:**

Inspector Name: COSTA, RYAN

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
211829	WELL	PR	08/13/1982	GW	055-06066	Sheep Mountain Unit 6-15-I	PR	X
211831	WELL	PR	05/15/1982	GW	055-06068	SHEEP MOUNTAIN UNIT 2-22-A	PR	
211832	WELL	PR	09/30/1982	GW	055-06069	SHEEP MOUNTAIN UNIT 4-14-M	PR	
211833	WELL	PR	09/29/1982	GW	055-06070	SHEEP MOUNTAIN UNIT 5-15-0	PR	
211834	WELL	PR	03/20/2008	GW	055-06071	SHEEP MOUNTAIN UNIT 1-22-H	PR	
211837	WELL	PR	09/30/1982	GW	055-06074	SHEEP MOUNTAIN UNIT 3-23-D	PR	
436941	WELL	DG	09/09/2014		055-06314	Sheep Mountain Unit 4-23-L	DG	

**Equipment:****Location Inventory**

Special Purpose Pits: _____	Drilling Pits: _____	Wells: <u>7</u>	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Motors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

**Location****Lease Road:**

Type	Satisfactory/Action Required	comment	Corrective Action	Date
Access	SATISFACTORY			

Emergency Contact Number (S/A/V): \_\_\_\_\_

Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

**Good Housekeeping:**

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
DEBRIS	<b>ACTION REQUIRED</b>	Stumps left in piles on the Northeast and Northwest corner of location. SEE ATTACHED PHOTOS #7, #12	Remove stumps off location	12/15/2014
WEEDS	<b>ACTION REQUIRED</b>	Noxious weeds (Diffuse Knapweed) appears to be growing along the pipeline between SMU 6-15-I and the meter station. It was also noticed along roadsides and around the meter station.	Implement early Spring weed control. BMP 7c. Control weeds in areas surrounding reclamation areas in order to reduce weed competition.	05/31/2015

Inspector Name: COSTA, RYAN

<b>Spills:</b>				
Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

<b>Venting:</b>		
Yes/No	Comment	

<b>Flaring:</b>					
Type	Satisfactory/Action Required		Comment	Corrective Action	CA Date

**Predrill**

Location ID: 211829

**Site Preparation:**

Lease Road Adeq.: SATISFACTORY

Pads: SATISFACTORY

Soil Stockpile: \_\_\_\_\_

**S/A/V:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/A/V:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Wildlife BMPs:**

BMP Type	Comment
Interim Reclamation	<p>4. Interim reclamation</p> <ul style="list-style-type: none"> <li>a. Use a variety of native grasses and forbs to establish effective, interim reclamation on all disturbed areas (e.g., road shoulders and borrow areas), including disturbed areas where additional future ground disturbance is expected to occur.</li> <li>b. Oxy will make a good-faith effort to perform interim reclamation to final reclamation species composition and establishment standards.</li> <li>c. Perform "interim" reclamation on all disturbed areas not needed for active support of production operations.</li> </ul> <p>5. Riparian areas (none associated with this pad or associated access roads and pipelines)</p> <ul style="list-style-type: none"> <li>a. Replace all riparian vegetation removed during development at a rate of at least 3:1.</li> <li>b. Restore both form and function of impacted wetlands and riparian areas and mitigate erosion.</li> </ul> <p>6. Disposal</p> <ul style="list-style-type: none"> <li>a. Remove well pad and road surface materials that are incompatible with post-production land use and re-vegetation requirements.</li> <li>b. Remove and properly dispose of degraded silt fencing and erosion control materials after their utility has expired.</li> <li>c. Remove and properly dispose of pit contents where contamination of surface water, groundwater, or soil by pit contents cannot be effectively prevented.</li> </ul> <p>7. Establishing reclaimed areas</p> <ul style="list-style-type: none"> <li>a. Apply certified weed free mulch and crimp or tacyfy to remain in place to reclaim areas for seed preservation and moisture retention.</li> <li>b. Utilize staked soil retention blankets for erosion control and reclamation of large surface areas with 3:1 or steeper slopes. Avoid use of plastic blanket materials, known to cause mortality of snakes.</li> <li>c. Control weeds in areas surrounding reclamation areas in order to reduce weed competition.</li> <li>d. Educate employees and contractors about weed issues.</li> </ul> <ul style="list-style-type: none"> <li>• Use early and effective reclamation techniques, including an aggressive interim reclamation program, to return habitat to use by greater sage-grouse as quickly as possible.</li> <li>• Gate single-purpose roads and restrict general public access to reduce traffic disruptions to wildlife.</li> <li>• Close and immediately reclaim all roads that are redundant, not used regularly, or have been abandoned to the maximum extent possible to minimize disturbance and habitat fragmentation.</li> <li>• Avoid aggressive non-native grasses and shrubs in mule deer and elk habitat restoration.</li> <li>• Reclaim mule deer and elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed.</li> <li>• Restore disturbed sagebrush sites with the appropriate sagebrush species or subspecies on disturbed sagebrush sites. Use locally collected seed for reseeding where possible.</li> </ul>
Wildlife	<p>OXY USA WTP LP and OXY USA Inc.</p> <p>Sensitive Wildlife Habitat: Elk Production Area and Bighorn Sheep</p> <ul style="list-style-type: none"> <li>• Consult with CPW to identify locations of elk production areas and bighorn sheep production areas. Map all seasonal habitats using CPW habitat selection models as they become available.</li> <li>• After drilling and completions activities reduce visits to well-sites through remote monitoring (i.e. SCADA) and the use of multi-function contractors.</li> <li>• Schedule, as best as possible, well site visitations to portions of the day between 8:00 a.m. and 3:00 p.m. between November 1 through April 15 in Bighorn Sheep areas.</li> <li>• Schedule, as best as possible, well site visitations to portions of the day between 8:00 a.m. and 3:00 p.m. between May 15 through June 30 in elk production areas.</li> <li>• Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.</li> <li>• Implement the species appropriate Infrastructure Layout and Drilling and Production Operations Wildlife Protection Measures found in Section II D. of the CPW Wildlife BMP document as follows:</li> <li>• Section II D. DRILLING AND PRODUCTION OPERATIONS WILDLIFE PROTECTION MEASURES: The purpose of these measures is to reduce disturbance on the actual drill site and the surrounding area, to reduce direct conflict with wildlife and hunters, and to prevent wildlife access to equipment.</li> <li>1. Use centralized hydraulic fracturing operations.</li> <li>2. Where possible, transport water through centralized pipeline systems rather than by trucking.</li> <li>3. Where possible, locate pipeline systems under existing roadways, or roadways that are planned for development.</li> <li>4. Maximize use of state-of-the-art drilling technology (e.g., high efficiency rigs, coiled-tubing unit rigs, closed-loop or pitless drilling, etc.) to minimize disturbance.</li> </ul>

5. Conduct well completions with drilling operations to limit the number of rig moves and traffic.
6. Install exclusionary devices to prevent bird and other wildlife access to equipment stacks, vents and openings.
  - Minimize surface disturbance and fragmentation of elk and bighorn sheep habitat through use of the smallest facility footprints possible, use of multiple well pads, clustering of roads and pipelines, and the widest possible spacing of surface facilities.
  - Remove all unnecessary infrastructure.
  - Treat waste water pits and any associated pit containing water that provides a suitable medium for breeding mosquitoes with Bti (*Bacillus thuringiensis* v. *israelensis*) or take other effective action to control mosquito larvae that may spread West Nile Virus to wildlife, especially grouse.
  - In order to prevent wildlife from accessing the temporary drilling pits, pits will be contained by a 4-foot high fence. Further, while the pit is not in use, flagging will be placed over the pit to prevent birds from entering the pit.
  - Implement the species appropriate reclamation guidelines found in Section II G. of the CPW Wildlife BMP document.
  - Section II G. RESTORATION, RECLAMATION AND ABANDONMENT: The purpose of these measures is to restore disturbed sites to their pre-development conditions, using native vegetation that can be used by the indigenous wildlife. Develop a reclamation plan in consultation with CPW, NRCS, and the land owner or land management agency that incorporates wildlife species-specific goals and that defines reclamation performance standards, including the following components:
    1. Seed
      - a. Use only certified weed-free native seed in seed mixes, unless use of non-native plant materials is recommended by CPW.
      - b. Use locally adapted seed whenever available, especially for species which have wide geographic ranges and much genetic variation (e.g., big sagebrush (*Artemisia tridentata*), antelope bitterbrush (*Purshia tridentata*), etc.).
      - c. Where more than one ecotype of a given species is available and potentially adapted to the site, include more than one ecotype per species in the seed mix.
      - d. Use appropriately diverse reclamation seed mixes that mirror an appropriate reference area for the site being reclaimed (see also species-specific recommendations).
      - e. Conduct seeding in a manner that ensures that seedbed preparation and planting techniques are targeted toward the varied needs of grasses, forbs and shrubs (e.g., seed forbs and shrubs separately from grasses, broadcast big sagebrush but drill grasses, etc.).
      - f. Emphasize bunchgrass over sod-forming grasses in seed mixes in order to provide more effective wildlife cover and to facilitate forb and shrub establishment.
      - g. Seed immediately after recontouring and spreading topsoil. Spread topsoil and conduct seeding during optimal periods for seed germination and establishment. Use of the same contractor for re-contouring land as used for seeding is often the most effective approach.
      - h. Do not include aggressive, non-native grasses (e.g., intermediate wheatgrass, pubescent wheatgrass, crested wheatgrass, smooth brome, etc.) in reclamation seed mixes. Site specific exceptions may be considered.
      - i. Distribute quick germinating site adapted native seed or sterile non-native seed for interim reclamation on cut and fill slopes and topsoil piles.
      - j. Plan for reclamation failure and be prepared to repeat seeding as necessary to meet vegetation cover, composition, and diversity standards.
    2. Vegetative Cover Standard
      - a. Choose reference areas as goals for reclamation that have high wildlife value, with attributes such a diverse and productive understory of vegetation, productive and palatable shrubs, and a high prevalence of native species.
      - b. Establish vegetation with total perennial non-invasive plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.
      - c. Establish vegetation with plant diversity of non-invasive species which is at least half that of pre-disturbance or reference area levels. Quantify diversity of vegetation using a metric that considers only species with at least 3 percent relative plant cover.
      - d. Observe and maintain a performance standard for reclamation success characterized by the establishment of a self-sustaining, vigorous, diverse, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development.
    3. Timing
      - a. Use early and effective reclamation techniques, including interim reclamation to accelerate return of disturbed areas for use by wildlife.
      - b. Remove all unnecessary infrastructure.
      - c. Close and reclaim roads not necessary for development immediately, including removing all bridges and culverts and recontouring/reclaiming all stream crossings.

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- d. Reclaim reserve pits as quickly as possible after drilling and ensure that pit contents do not contaminate soil.
- e. Remediate hydrocarbon spills on disturbed areas prior to reclamation.
- f. Reclaim sites during optimum seasons (e.g. late fall/early winter or early spring).
- g. Complete final reclamation activities so that seeding occurs during the first optimal season following plugging and abandonment of oil and gas wells.

S/A/V: ACTION

Comment:

CA:

Date:

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
WADDLES	No		

S/A/V: ACTION  
REQUIRED

Corrective Action: **Use BMP's to protect water spring at the West and Northeast side of the location.** Date: **12/15/2014**

Comments: Erosion BMPs: **There is a water spring at the West and Northeast side of the location. SEE ATTACHED PHOTO #4**

Other BMPs:

WADDLES	No		
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S/A/V: ACTION  
REQUIRED

Corrective Action: **Implement BMP's to protect soil erosion from occurring.** Date: **12/15/2014**

Comments: Erosion BMPs: **There is no stormwater controls on the East and West side of the location where timber has recently been cut causing ground disturbance. SEE ATTACHED PHOTOS #6, #8, #10, #11**

Other BMPs: **BMP 4a. Use a variety of native grasses and forbs to establish effective, interim reclamation on all disturbed areas (e.g., road shoulders and borrow areas), including disturbed areas where additional future ground disturbance is expected to occur.**

**Comment:**

**Staking:**

**On Site Inspection (305):**

Surface Owner Contact Information:

Name: Address:

Phone Number: Cell Phone:

Operator Rep. Contact Information:

Landman Name: Phone Number:

Date Onsite Request Received: Date of Rule 306 Consultation:

Request LGD Attendance:

LGD Contact Information:

Name: Phone Number: Agreed to Attend:

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

**Facility**

Facility ID: 211829 Type: WELL API Number: 055-06066 Status: PR Insp. Status: PR

**Environmental****Spills/Releases:**

Type of Spill: Description: Estimated Spill Volume:

Comment:

Corrective Action: Date:

Reportable: GPS: Lat Long

Proximity to Surface Water: Depth to Ground Water:

**Water Well:**

Lat Long

DWR Receipt Num: Owner Name: GPS :

**Field Parameters:**

Sample Location:

**Complaint:**

Tracking Num	Category	Assigned To	Description	Incident Date
200416010	FENCING	Costa, Ryan	"Damaged cattle guards."	10/29/2014
200416010	OTHER	Costa, Ryan	"Crushed 15000 tons of rock from my property. Did not have a permit to crush the rock."	10/29/2014
200416010	PROPERTY DAMAGE	Gintautas, Peter	"On 4/28/2014 and 4/30/2014 OXY cut down approximately 400 of my trees from DS 6-15 and DS 7-15 before they had the required permits. They lied to COGCC and BLM and told them that they had paid me for the trees (27 Aug 2014). On 18 Sept 2014 I was paid for the trees. To date they have not cleaned up the area. Tree stumps are still stand. They are not sure if they will drill at these locations now."	10/29/2014
200416010	ROADS	Costa, Ryan	"After 100's of vehicles drove over my surface land for DS# 1 -12B Oxy left my road (SEE ATTACHED PHOTOS). I asked that the road be graded and new gravel put on surface road by 9 Oct 2014. This work was not done."	10/29/2014
200416010	WEEDS	Costa, Ryan	"Noxious weeds have increased 90% since OXY took over operation at Sheep Mountain Unit. I first contacted OXY June 2011. Since then the noxious weeds have spread 90% more."	10/29/2014

Emission Control Burner (ECB):

Comment:

Pilot: Wildlife Protection Devices (fired vessels):

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: Date Interim Reclamation Completed:

Land Use: RANGELAND

Comment:

1003a. Debris removed? CM

CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Waste Material Onsite? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Unused or unneeded equipment onsite? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Pit, cellars, rat holes and other bores closed? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Guy line anchors removed? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_  
 Guy line anchors marked? \_\_\_\_\_ CM \_\_\_\_\_  
 CA \_\_\_\_\_ CA Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? \_\_\_\_\_  
 1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_  
 Cuttings management: \_\_\_\_\_  
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_  
 Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_ F \_\_\_\_\_

Comment: Noxious weeds (Diffuse Knapweed) appears to be growing along the pipeline between SMU 6-15-I and the meter station. It was also noticed along roadsides and around the meter station. Implement early Spring weed control.

Overall Interim Reclamation **Fail**

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_  
 Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_  
 Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_  
 Gravel removed \_\_\_\_\_  
 Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_  
 Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_  
 Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_  
 Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_  
 Comment: \_\_\_\_\_



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Corrective Action:				Date		
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
S/A/V: <b>ACTION REQUIRED</b> Corrective Date: <b>12/15/2014</b>						
Comment: There is no stormwater controls on the East and West side of the location where timber has recently been cut causing ground disturbance. SEE ATTACHED PHOTOS #6, #8, #10, #11						
CA: Implement BMP's to protect soil erosion from occurring.						
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
Wood mulch debris remains on soil surface which can cause soil degradation. Remove and dispose of wood mulch debris prior to salvaging the topsoil. SEE ATTACHED PHOTOS #2, #3	CostaR	11/17/2014
Wood mulch debris remains on soil surface where timber has been cut (SEE ATTACHED PHOTOS #2, #3). The thick layer of mulch debris can impede plant growth and establishment. Remove wood mulch debris to allow vegetation establishment.	CostaR	11/06/2014

#### Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
673501819	Site Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3485552">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3485552</a>

## **ACTION REQUIRED**

**ANY ACTION REQUIRED** items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)