



COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203



WARNING LETTER #2558814

January 7, 2015

Robert L Wright – Operator #97620
c/o Lisa Wright
318 Oak Drive
Durango, CO 81301

Weaver A #2 API#083-06136
Weaver A #3 API#083-06137
Weber #1 API#083-06448
Weber #1 API#083-6449
Township 35N Range13W
Montezuma County

This Warning Letter is to inform you that the oil and gas facility or the oil and gas operations listed above may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and correction 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 Warning Letter 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.

The COGCC requires Robert L Wright or legal representative to implement corrective action(s) for the conditions identified below.

COGCC recently conducted a phone audit to verify address and phone numbers for Robert L Wright, operator of record for the referenced wells located in Montezuma County and was unable to contact the operator via phone. COGCC is holding a perpetual surety bond #AE-71351-66 issued by American Employers Insurance Company now Sparta Insurance Company for the referenced fee wells until all obligations have been met and bond is released by COGCC. All plugged and abandoned wells and associated facilities must pass final reclamation inspection pursuant to Rule 1004c.

P 303.894.2100 F 303.894.2109 www.colorado.gov/cogcc

Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,

James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk

John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



Therefore, COGCC is requesting that a Form 1 Registration for Oil and Gas Operation (change of information) and Form 1A Designation of Agent (principle agent) be submitted for the proper operator of the referenced wells pursuant to Rule 302.a and 302.b.

Rule 302.a Form 1 - Registration for Oil and Gas Operations Rule 302.b Form 1A - Designation of Agent
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How to Comply with this Warning Letter:

- 1) Complete and submit an original Form 1 signed by an officer, principal or legal representative of the company. The Form 1 shall include an emergency contact and alternative emergency phone numbers.
- 2) Complete and submit an original Form 1A designating a "principle agent" serving as the representative of the operator to accept and be served with notices from COGCC. If a third-party agent is authorized to sign and submit documents on behalf of the operator, please complete the first box with Agent Company Name and Address. This form should provide valid direct phone numbers, signature, and valid email address for all parties listed, and signature approval by an officer, principal or legal representative of the operator. Instructions and examples can be found on our website at www.colorado.gov/cogcc at the "Forms" link. Forms are listed numerically.

Corrective Action Deadline Date: February 8, 2015

Failure to Comply with Warning Letter:

If Robert L Wright or legal representative fails to perform required corrective actions, COGCC will issue a Notice of Alleged Violation and seek penalties 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.)

All well data, rules and forms are available on our website at www.colorado.gov/cogcc If you have any questions about this Warning Letter, please contact the COGCC representative below.

Sincerely,



Martha Ramos
Financial Assurance Supervisor
Martha.ramos@state.co.us

Attachments: Form 1 Registration for Oil and Gas Operations (change of information)
 Form 1A Designation of Agent
 Rule 1004 & Operator Inspection Results Report



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Robert L Wright
c/o Lisa Wright
318 Oak Drive
Durango, Co 81301

2. Article Number

(Transfer from service label)

7014 0510 0002 0093 0408

PS Form 3811, July 2013

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

RECEIVED

- ☐
- Agent
-
- ☐
- Addressee

B. Received by (Printed Name)

JAN 20 2015

C. Date of Delivery

D. Is delivery address different from item 1?

If YES, enter delivery address below:

- ☐
- Yes
-
- ☐
- No

3. Service Type

- ☒
- Certified Mail®
- ☐
- Priority Mail Express™
-
- ☐
- Registered
- ☒
- Return Receipt for Merchandise
-
- ☐
- Insured Mail
- ☐
- Collect on Delivery

4. Restricted Delivery? (Extra Fee)

- ☐
- Yes

Domestic Return Receipt



State of Colorado
Oil and Gas Conservation Commission

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



FOR OGCC USE ONLY

REGISTRATION FOR OIL AND GAS OPERATIONS

Each company conducting oil-and-gas-related operations is required to submit a Form 1. Submit a separate registration for each regional/field office which will be an active reporter. A new registration is required to document change of address or addition/deletion of types of operations.

☐ Corporate Office

☐ Regional/Field Office

OGCC Operator Number (if you have one):

☐ New

☐ Change in Information

☐ Delete

☐ New

☐ Change in Information

☐ Delete

Corporate Office

Name of Company:			
Address:			
City:	State:	Zip:	Country (if not U.S.):
Phone No:		Fax No:	
Contact Name(s):			
Emergency Contact Name(s):			
Emergency Phone Number(s):			

OGCC Operator Number Suffix: ☐

Regional/Field Office (if any)

Name of Company:		
Address:		
City:	State:	Zip:
Phone No:		Fax No:
Contact Name(s):		
Emergency Contact Name(s):		
Emergency Phone Number(s):		

CORPORATE OPERATIONS

Write A to Add or D to Delete operations from your OGCC record. Indicate all that apply.

<input type="checkbox"/>	Operator
<input type="checkbox"/>	Producer
<input type="checkbox"/>	Gatherer
<input type="checkbox"/>	Transporter
<input type="checkbox"/>	Levy Payor
<input type="checkbox"/>	Injection Well Oper.
<input type="checkbox"/>	Pit Operator
<input type="checkbox"/>	Driller
<input type="checkbox"/>	Seismic Operator
<input type="checkbox"/>	Financial Assurance Provider
<input type="checkbox"/>	Downstream Gas Facility
<input type="checkbox"/>	Insurance Agent
<input type="checkbox"/>	Domestic Well Operator
<input type="checkbox"/>	Vendor

General Mailing

Hearing notices are mailed monthly. Please call OGCC for information.

Print Name: _____

Signature: _____ Title: _____ Date: _____

State of Colorado
Oil and Gas Conservation Commission

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

FOR OGCC USE ONLY

DESIGNATION OF AGENT

Any party acting as an agent of an owner(s) of the lease or well shall have a valid Form 1A on file with the Commission. Individual access to online form submission will not be activated until this form is received, via mail or fax, at the address above. This designation shall remain in effect until written notice is provided by the owner to terminate the agent or representative. Approved persons to submit documents as employees of the company should be listed on Form 1A, no agent information required.

Agent Company Name:			
Address:		City:	State: Zip:
A Principal Agent serves as the representative of the operator, to accept and be served with notices from the Oil and Gas Conservation Commission, or from other persons authorized under the Oil and Gas Conservation Act of the State of Colorado. Furthermore, the Principle Agent agrees to immediately report in writing, all changes of address of the agent, and any termination of the agent's authority, and in the latter case, the designation of a new agent or agents shall be immediately made.			
Name of Principal Agent:	Signature of Principal Agent:		Title of Principal Agent: Action: <input type="checkbox"/> Add <input type="checkbox"/> Modify <input type="checkbox"/> Delete
Phone:	Fax:	Email:	

The below listed individuals are designated as representatives, authorized to sign and submit forms on behalf of the operator:

Print Name	Signature	Title	Action : <input type="checkbox"/> Add <input type="checkbox"/> Modify <input type="checkbox"/> Delete
Phone	Email	Forms Authorized to Submit (ALL or Form #s)	

Print Name	Signature	Title	Action : <input type="checkbox"/> Add <input type="checkbox"/> Modify <input type="checkbox"/> Delete
Phone	Email	Forms Authorized to Submit (ALL or Form #s)	

Print Name	Signature	Title	Action : <input type="checkbox"/> Add <input type="checkbox"/> Modify <input type="checkbox"/> Delete
Phone	Email	Forms Authorized to Submit (ALL or Form #s)	

Pursuant to the Rules and Regulations, and Rules of Practice and Procedure of the Oil and Gas Conservation Commission of the State of Colorado, the below-signed producer, operator, transporter, refiner, gasoline or other extraction plant operator, or initial purchaser who is conducting oil and gas operations in the State of Colorado, does hereby designate the above-listed Agent Company and/or representative(s) as authorized to sign on behalf of the operator.

Authorizing Company Name:		OGCC Operator Number:	Approval Date:
Print Authorizing Name:	Authorizing Signature:	Authorizing Title (must be an officer):	

adjacent or nearby undisturbed land or the reference area. Each photograph shall be identified by date taken, well name, GPS location, and direction of view.

- f. **Weed control.** During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Weed control measures shall be conducted in compliance with the Colorado Noxious Weed Act, C.R.S. §35-5.5-115 and the current rules pertaining to the administration and enforcement of the Colorado Noxious Weed Act. It is recommended that the operator consult with the local weed control agency or other weed control authority when weed infestation occurs. It is the responsibility of the operator to monitor affected and reclaimed lands for noxious weed infestations. If applicable, the Director may require a weed control plan.

1004. FINAL RECLAMATION OF WELL SITES AND ASSOCIATED PRODUCTION FACILITIES

- a. **Well sites and associated production facilities.** Upon the plugging and abandonment of a well, all pits, mouse and rat holes and cellars shall be backfilled. All debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well. All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and recontoured. Culverts and any other obstructions that were part of the access road(s) shall be removed. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. The burning or burial of such material on the premises shall be performed in accordance with applicable local, state, or federal solid waste disposal regulations and in accordance with the 900-Series Rules. In addition, material may be burned or buried on the premises only with the prior written consent of the surface owner. All such reclamation work shall be completed within three (3) months on crop land and twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities. The Director may grant an extension where unusual circumstances are encountered, but every reasonable effort shall be made to complete reclamation before the next local growing season.
- b. **Production and special purpose pit closure.** The operator shall comply with the 900 series rules for the removal or treatment of E&P waste remaining in a production or special purpose pit before the pit may be closed for final reclamation. After any remaining E&P waste is removed or treated, all such pits must be back-filled to return the soils to their original relative positions. As to both crop lands and non-crop lands, if subsidence occurs over closed pit locations, additional topsoil shall be added to the depression and the land shall be re-leveled as close to its original contour as practicable.
- c. **Final reclamation threshold for release of financial assurance.** Successful reclamation of the well site and access road will be considered completed when:
 - (1) On crop land, reclamation has been performed as per Rules 1003 and 1004, and observation by the Director over two growing seasons has indicated no significant unrestored subsidence.
 - (2) On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal. The Director shall consider the total cover of live

perennial vegetation of adjacent or nearby undisturbed land, not including overstory or tree canopy cover, having similar soils, slope and aspect of the reclaimed area.

- (3) Disturbances resulting from flow line installations shall be deemed adequately reclaimed when the disturbed area is reasonably capable of supporting the pre-disturbance land use.
 - (4) A Sundry Notice Form 4, has been submitted by the operator which describes the final reclamation procedures, any changes, if applicable, in the landowner's designated final land use, and any mitigation measures associated with final reclamation performed by the operator, and
 - (5) A final reclamation inspection has been completed by the Director, there are no outstanding compliance issues relating to Commission rules, regulations, orders, permit conditions or the act, and the Director has notified the operator that final reclamation has been approved.
- d. Final reclamation of all disturbed areas shall be considered complete when all activities disturbing the ground have been completed, and all disturbed areas have been either built upon, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, or equivalent permanent, physical erosion reduction methods have been employed. Re-seeding alone is not sufficient.
- e. **Weed control.** All areas being reclaimed shall be kept as free as practicable of all undesirable plant species designated to be noxious weeds. Weed control measures shall be conducted in compliance with the Colorado Noxious Weed Act, C.R.S. §35-5.5-115 and the current rules pertaining to the administration and enforcement of the Colorado Noxious Weed Act. It is recommended that the operator consult with the local weed control agency or other weed control authority when weed infestation occurs. It is the responsibility of the operator to monitor affected and reclaimed lands for noxious weed infestations. If applicable, the Director may require a weed control plan.



Wells by Operator Showing Inspection Results

WRIGHT* ROBERT L

Operator Number: 97620

There is no site reclamation status

API Number	Well Name	Well Number	Footage NS	Footage EW	dir	Sec	Typ	Range	Status	Status Date	Mineral Owner	Surface Owner	Insp. Date	Insp. Type	Rec. Status	Insp. P/F
MONTEZUMA																
05-083-06029	FEDERAL-VANCE	1X	2,282 FSL	1,567 FEL	NWSE	7	35N	13W	SI	08/01/1988	FEDERAL	FEDERAL				
05-083-06122	B & W FEDERAL	B-1	840 FSL	2,296 FWL	SESW	30	36N	17W	SI	08/30/1952	FEDERAL	FEDERAL	Jun 1 2004	CA		P
05-083-06136	WEAVER "A"	2	1,516 FSL	1,016 FWL	NWSW	6	35N	13W	DA	03/02/1976	FEE					
05-083-06137	WEAVER "A"	3	2,533 FNL	163 FWL	SWNW	6	35N	13W	DA	03/12/1976	FEE					
05-083-06156	B & W FEDERAL	B-2	990 FSL	660 FWL	SWSW	29	36N	17W	SI	06/30/1976	FEDERAL	FEDERAL				
05-083-06245	FEDERAL-VANCE	7	2,073 FSL	1,351 FEL	NWSE	7	35N	13W	PA	06/20/1994	FEDERAL	FEDERAL				
05-083-06246	FEDERAL-VANCE	8	2,232 FSL	1,096 FEL	NESE	7	35N	13W	SI	08/01/1988	FEDERAL	FEDERAL				
05-083-06448	WEBER	1	1,030 FNL	1,820 FEL	NWNE	8	35N	13W	DA	06/10/1985	FEE					
05-083-06449	WEBER	1	1,003 FNL	1,520 FEL	NWNE	8	35N	13W	DA	06/20/1985	FEE					
05-083-06460	FEDERAL	9	2,306 FSL	1,719 FEL	NWSE	7	35N	13W	DA	09/05/1985	FEDERAL	FEDERAL				
05-083-06461	FEDERAL	14	2,355 FSL	346 FEL	NESE	7	35N	13W	DA	09/05/1985	FEDERAL	FEDERAL				
05-083-06472	FEDERAL	6X	2,498 FSL	1,084 FEL	NESE	7	35N	13W	AL	05/27/1986	FEDERAL	FEDERAL				

Total Wells for County:

12

Total Wells: 12 There is no site reclamation status

Site reclamation has passed inspection

MONTEZUMA																
05-083-06062	UNION PLAZA	1	1,650 FNL	1,980 FWL	SENV	17	35N	13W	DA	05/16/1972	FEE		Dec 16 1998	HR	P	P
05-083-06107	WEAVER - "A"	1	329 FSL	214 FWL	SWSW	6	35N	13W	DA	03/12/1976	FEE		Dec 29 1998	HR	P	P
05-083-06138	DUDDLESTON	B-1	1,270 FNL	330 FWL	NWNW	8	35N	13W	DA	05/18/1977	FEE		Dec 15 1998	HR	P	P
05-083-06209	LEE (BLW-NIESA VERDE)	3	2,002 FNL	1,783 FWL	SENV	25	36N	15W	PA	09/11/1985	FEE		Apr 5 2011	HR	P	P
05-083-06210	LEE (BLW-NIESA VERDE)	2	2,457 FNL	1,903 FWL	SENV	25	36N	15W	PA	09/11/1985	FEE		Apr 5 2011	HR	P	P
05-083-06211	LEE (BLW-NIESA VERDE)	1	2,389 FNL	1,559 FWL	SENV	25	36N	15W	PA	09/11/1985	FEE		Apr 5 2011	HR	P	P
05-083-06214	LEE (BLW-NIESA VERDE)	6	2,445 FNL	2,198 FWL	SENV	25	36N	15W	PA	09/11/1985	FEE		Apr 5 2011	HR	P	P
05-083-06358	LEE	9	1,540 FSL	1,080 FWL	NWSW	25	36N	15W	DA	09/11/1985	FEE		Jan 11 2010	HR	P	P
05-083-06395	KEESE	1	318 FNL	1,132 FEL	NENE	5	34N	13W	DA	09/26/1983	FEE		Dec 4 1998	HR	P	P
05-083-06397	LEWIS	1	2,116 FNL	550 FEL	SENE	8	35N	13W	DA	10/31/1983	FEE		Dec 15 1998	HR	P	P
05-083-06423	DUDDLESTON	3-1	1,520 FNL	2,273 FEL	SWNE	8	35N	13W	PA	01/17/2002	FEE		Nov 9 2009	HR	P	P
05-083-06429	GARCIA FARMS	1	550 FNL	200 FEL	NENE	7	35N	13W	DA	01/27/1985	FEE		Dec 8 1998	HR	P	P
05-083-06443	WEST	3	1,227 FNL	2,008 FEL	NWNE	31	36N	17W	PA	06/01/2004	FEE		Aug 24 2004	SR	P	P
05-083-06450	WEBER	3	924 FNL	1,120 FEL	NENE	8	35N	13W	AL	06/05/1986	FEE		Dec 15 1998	HR	P	P
05-083-06451	WEBER	4	635 FNL	991 FEL	NENE	8	35N	13W	AL	05/27/1986	FEE		Dec 15 1998	HR	P	P
05-083-06452	WEBER	5	500 FNL	200 FWL	NWNW	9	35N	13W	AL	10/22/1987	FEE		Dec 15 1998	HR	P	P



Wells by Operator Showing Inspection Results

WRIGHT* ROBERT L

Operator Number: 97620

API Number	Well Name	Well Numbr	Footlanc	Footlanc	Sec	Typ	Range	Status	Status Date	Mineral	Surface	Insp.	Rec.	Insp.	
		NS	EW	qtrtr						Owner	Owner	Insp. Date	Type	Status	P/F

Total Wells for County: 16

Total Wells:	16	Site reclamation has passed inspection
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STATE OF COLORADO

DEPARTMENT OF NATURAL RESOURCES

Oil & Gas Conservation Commission

1120 Lincoln Street, Suite 801

Denver, Colorado 80203-2136

341000526

W
9/16/20

Robert L. Wright
WRIGHT* ROBERT L
P O BOX 1196
CORTEZ, CO 81321

PRESORTED
FIRST CLASS

STATE OF COLORADO
OFFICIAL MAIL
PENALTY FOR PRIVATE USE

U.S. POSTAGE >> PITNEY BOWES



ZIP 80216 \$ 000.40⁶
02 1W
0001374420 DEC 23 2014



RETURN SERVICE REQUESTED
RECEIVED

DEC 30 2014

COGCC

FORWARD TIME EXP RTN TO SENDER
X 871 MFE 125091310012/24/14
WRIGHT
PO BOX 1196
CORTEZ CO 81321-1196

RETURN TO SENDER

K1787993 81321