



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

June 18, 2015

Certified Mail Return Receipt Requested #7014 0510 0002 0093 3775

Mr. John Teff
CM Production LLC
390 Union Blvd., Suite 620
Lakewood, CO 80228

Re: Compliance Status
SJ Warren Remediation Project #8179
Oliver Warren Remediation Project #8209

Dear Mr. Teff,

As you are aware, the Colorado Oil & Gas Conservation Commission (COGCC) approved Remediation Plans for the land treatment of oily waste at the subject locations on January 28, 2015. Each plan was approved with nine (9) conditions of approval. The conditions of approval required the collection of soil samples from the treated material a minimum of twice per year to establish rates of biodegradation. The conditions also required submittal of semi-annual progress reports no later than April 30th and October 31st each year. COGCC has not received the April 30th progress report. No documentation has been provided to demonstrate that land treatment has been performed in accordance with the approved plans.

Condition of approval 3.d. specifically stated, "Failure to submit the semi-annual progress reports by the due dates will result in the requirement to immediately dispose all oily waste off site at an appropriate disposal facility."

Due to the failure to comply with the required conditions of approval, COGCC is requiring the following corrective actions.

1. Immediately remove all oily waste at both the SJ Warren and Oliver Warren locations in Washington County and properly dispose in accordance with Rule 907.e.
2. Provide a report documenting the off-site disposal including all waste transportation and disposal documentation required by Rule 907.b.(2). Documentation shall verify that the estimated 2,500 cubic yards of waste at the Oliver Warren site and estimated 500 cubic yards of waste at the SJ Warren was properly disposed. The report shall be submitted no later than August 18, 2015.

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

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3. Restore/reclaim the surface at both locations that was disturbed by the land treatment area. Provide photo documentation of the surface restoration in the report due no later than August 18, 2015.

Failure to comply with the required corrective actions by the due dates will result in additional enforcement action.

If you have any questions, please call me at 303-894-2100, ext. 5115.

Sincerely,
Colorado Oil and Gas Conservation Commission



John Axelson, P.G.
East Environmental Supervisor

Cc. Greg Deranleau - COGCC Environmental Manager
Jeremy Ferrin - COGCC Enforcement Officer
Remediation Project Files - 8179, 8209