



## WARNING LETTER # 401582666

03/22/2018

HIGHLANDS NATURAL RESOURCES CORPORATION (# 10625)

ERIC ANDERSON

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220 JOSEPHINE STREET

DENVER, CO 80206

**This Warning Letter is to inform you that HIGHLANDS NATURAL RESOURCES CORPORATION (“Operator”) may be in violation of the rules and regulations of the Colorado Oil and Gas Conservation Commission (“COGCC”) and corrective action is required.**

The COGCC has reasonable cause to believe that the Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. The Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). 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.

### Alleged Violation(s) and Required Corrective Action(s):

#### 205A Hydraulic Fracturing Chemical Disclosure

Violation Date: 03/22/2018

Violation Discovery Date: 02/01/2018

Description of Alleged Violation: Rule 205A. <FracFocus>

#### Alleged Violation

Operator is receiving this letter because, based on COGCC records, COGCC has reason to believe the Wells in the attached table present one or more compliance issues. Operator should review its records to verify if any FracFocus disclosures were late or are still outstanding for these Wells.

Pursuant to Rule 205A., Operator is required to complete the chemical disclosure registry form and post the form on the chemical disclosure registry within 60 days following the conclusion of a hydraulic fracturing treatment.

If Operator failed to submit the required disclosures to FracFocus within 60 days of concluding a hydraulic fracturing treatment, Operator violated Rule 205A.

Required Corrective Action: Corrective Action





Operator shall promptly submit any delinquent disclosures to FracFocus. Operator shall send an email to COGCC Representative Richard Murray at [g.richard.murray@state.co.us](mailto:g.richard.murray@state.co.us), confirming that all disclosures required under Rule 205A. have been submitted and detailing an internal procedure for timely compliance with Rule 205A. in the future. Operator shall reference this Warning Letter document number in the subject of the email.

Corrective Action Deadline Date: 04/23/2018

### **How to Comply with Warning Letter:**

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the COGCC staff identified below by the Corrective Action Deadline Date(s):

COGCC Enforcement: Kira Gillette  
Email: [kira.gillette@state.co.us](mailto:kira.gillette@state.co.us)

Title: NOAV Specialist  
Phone Num: (303) 894-2100 x5165

COGCC Representative: Richard Murray  
Email: [g.richard.murray@state.co.us](mailto:g.richard.murray@state.co.us)

Title: Engineering Tech  
Phone Num: (970)625-2497x4

If you have any procedural questions about this Warning Letter, please contact Kira Gillette.  
If you have any technical questions about this Warning Letter, please contact the COGCC Representative identified above.

### **Failure to Comply with Warning Letter:**

If the Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above the 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.

All well data, rules and forms are available on our website at [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc).

Sincerely,

Richard Murray  
Engineering Tech  
(970)625-2497x4  
[g.richard.murray@state.co.us](mailto:g.richard.murray@state.co.us)

### **Attachments**

View Attachments in Imaged Documents on COGCC website <http://ogccweblink.state.co.us/> Search by Document Number.

### **Document Number    Description**

401582669	WARNING LETTER DOCUMENTATION
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**COLORADO**  
**Oil & Gas Conservation**  
**Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

401582670

WARNING LETTER CERTIFIED MAIL RECEIPT

Total Attach: 2 Files

