

# ***O'Brien Energy Resources Corporation***

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## **Executive Offices:**

18 Congress Street, Suite 207  
Portsmouth, NH 03801  
Telephone (800) 291-1969  
Fax (603) 427-2499

February 10, 2020

Mr. Jeremy Ferrin  
Enforcement Supervisor  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**Re: COGCC NOAV No.: 402283885  
O'Brien Energy Resources Corp.  
Lost Creek #33 API: 05-123-23585  
Lost Creek #5 API: 05-123-21441**

Dear Mr. Ferrin:

O'Brien Energy Resources Corp. (O'Brien) respectfully requests that the COGCC review and accept the following compliance plan as an adequate response to Notice of Alleged Violation #402283885. The compliance plan addresses issues in regards to identifying and completing all compliance requirements in a timely and approvable manner. This compliance plan also addresses and provides a clear process for the timely submittal of all required form filing in accordance with Rules 319 and 326. A copy of this compliance plan will be posted in each O'Brien employee's workspace to ensure no future oversight occurs.

### **Colorado Oil and Gas Conservation Commission Compliance Plan**

O'Brien will conduct bi-annual compliance audits of all its wells. The first bi-annual compliance audit will occur every 15th day of January and the second bi-annual audit will occur every 15th day of July. Compliance audits will be conducted by reviewing a master compliance control list that includes the following:

- (1.) API and Well name
- (2.) SI or TA status by month, for each month the Well was SI or TA
- (3.) Date of last MIT
- (4.) Due date of next required MIT.
- (5.) Date of last Production
- (6.) Date Operator has scheduled to resolve future requirements
- (7.) Whether Operator is current on the Form 4 TA Sundry submittal
- (8.) Whether Operator is current on the Form 7 submittal
- (9.) Whether Operator is current on Bradenhead testing and Form 17 submittal
- (10.) Whether Operator is current on MIT testing and Form 21 submittal
- (11.) All upcoming compliance due dates will be reviewed and indicated

All future requirements due within six months of the biannual audit date will immediately be addressed and scheduled work will be commenced in advance upon approval of the COGCC to ensure no further delinquencies occur. Joseph Forma, President of O'Brien will be responsible for overseeing that the compliance plan is correctly implemented. This new plan has already helped us identify future requirements which are presently scheduled for completion. Attached is the master compliance audit sheet to be reviewed biannually. It is O'Brien's intent to have adequately satisfied the requirements identified in the NOAV. Please feel free to contact me at 603-944-8253 or joeforma@obenergy.com should you have any questions. Thank you for your time and assistance.

Respectfully,



Joseph Forma  
President