



STATE OF
COLORADO

Doc# 1310462

Trujillo - DNR, Aaron <aaron.trujillo@state.co.us>

Fwd: FW: Laramie Energy - COGCC Location 312503 - Bradshaw Dolley

3 messages

Arthur - DNR, Denise <denise.arthur@state.co.us>
To: Aaron Trujillo <aaron.trujillo@state.co.us>

Mon, Nov 9, 2020 at 10:40 AM

For our discussion

Denise T. Arthur, Ph.D.
Reclamation Supervisor



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

Phone 720 630-6533
1120 Lincoln Street, Suite 801, Denver, CO 80203
denise.arthur@state.co.us | www.colorado.gov/cogcc

----- Forwarded message -----

From: **Joel Minor** <Joel.Minor@coag.gov>
Date: Thu, Nov 5, 2020 at 10:46 AM
Subject: FW: Laramie Energy - COGCC Location 312503 - Bradshaw Dolley
To: Arthur - DNR, Denise <denise.arthur@state.co.us>, Mike Leonard - DNR <mike.leonard@state.co.us>

Denise and Mike,

I am not sure what this email is about—does it relate to a pending enforcement matter? Let me know if you would like to discuss at some point.

Joel

From: David Little <David.Little@Steptoe-Johnson.com>
Sent: Thursday, November 5, 2020 9:19 AM
To: denise.arthur@state.co.us
Cc: mike.leonard@state.co.us; Joel Minor <Joel.Minor@coag.gov>; Barb Hinman <bhinman@laramie-energy.com>
Subject: Laramie Energy - COGCC Location 312503 - Bradshaw Dolley

All,

Laramie Energy has asked our firm to assist it with this matter. The attached letter summarizes what Laramie Energy knows about the history of this location and requests COGCC closure and a release of Laramie Energy. We are very willing to review these facts and issues with you. Please contact me or Barb Hinman at Laramie Energy and we will help find the right persons to answer questions and assist in this process.

Thank you for your consideration.

David R. Little

Member

Step toe & Johnson PLLC

Denver, CO

O 303-389-4370 C 303-475-9520

david.little@step toe-johnson.com

www.step toe-johnson.com

Step toe & Johnson PLLC Note:

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 **2020.11.04-Letter to COGCC Re Bradshaw-Dolley Reclamation(11965751.2 SJDOCS).pdf**
1061K

Arthur - DNR, Denise <denise.arthur@state.co.us>

Fri, Nov 13, 2020 at 4:24 PM

To: David Little <David.Little@step toe-johnson.com>, Joel Minor <Joel.Minor@coag.gov>, Mike Leonard - DNR <mike.leonard@state.co.us>, Jeremy Ferrin - DNR <jeremy.ferrin@state.co.us>, Aaron Trujillo <aaron.trujillo@state.co.us>, bhinman@laramie-energy.com

Dear Mr. Little,

Thank you for your correspondence. While COGCC agrees with the assertion that Laramie Energy (Laramie) is not responsible for the reclamation of the subject location, there are several assertions in the correspondence with which COGCC staff does not agree. COGCC agrees that Laramie is not responsible for the reclamation due to the fact that Laramie is not the Operator of Record; OXY USA Inc. (OXY) is the Operator of Record. The subject COGCC corrective action inspection was sent to both OXY and Laramie, because a Laramie employee verbally informed the reclamation specialist that the reclamation was the responsibility of Laramie and would be conducted by them. There are other assertions in the correspondence with which COGCC staff does not agree. An example of such an assertion with which COGCC disagrees is that, since no oil and gas activities have taken place for eight years, "the jurisdiction of the COGCC over this surface location has ended". Plainly, this is a false assertion. COGCC jurisdiction over an oil and gas location ends when it has passed a final reclamation inspection.

Best regards, Denise T. Arthur PH.D.

Denise T. Arthur, Ph.D.
Reclamation Supervisor



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denise.arthur@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

David Little <David.Little@steptoe-johnson.com>

Fri, Nov 13, 2020 at 4:48 PM

To: "Arthur - DNR, Denise" <denise.arthur@state.co.us>, Joel Minor <Joel.Minor@coag.gov>, Mike Leonard - DNR <mike.leonard@state.co.us>, Jeremy Ferrin - DNR <jeremy.ferrin@state.co.us>, Aaron Trujillo <aaron.trujillo@state.co.us>
Cc: "bhinman@laramie-energy.com" <bhinman@laramie-energy.com>

Dr. Arthur,

Thank you very much for the response. I will pass it along to Laramie Energy.

I anticipate Laramie Energy or I will want to follow up to make sure that we all agree on and understand what, if anything, Laramie should be doing at this time with this location. Please let me know your thoughts about how we might do this most efficiently. I will check with Laramie and see what questions they may have and let you know.

Thanks again.

David R. Little

Member
Steptoe & Johnson PLLC

Denver, CO

O 303-389-4370 C 303-475-9520

david.little@steptoe-johnson.com
www.steptoe-johnson.com

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