



**COLORADO**  
**Oil & Gas Conservation**  
**Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

[www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

## WARNING LETTER # 402800482

09/02/2021

PDC ENERGY INC (# 69175)

VENESSA CHASE

[venessa.chase@pdce.com](mailto:venessa.chase@pdce.com)

1775 SHERMAN STREET - STE 3000

DENVER, CO 80203

(API# 123-11499)

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

COGCC has reasonable cause to believe that 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. 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 525, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

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

435 Form 6, Well Abandonment Reports

Violation Date: 09/02/2021

Violation Discovery Date: 09/01/2020

Description of Alleged Violation: Operator is receiving this letter because, based on COGCC records, COGCC has reason to believe the Well(s) indicated above and/or in the attached table presents one or more compliance issues. Operator should review its records to verify if any Form 6, Well Abandonment Reports, are outstanding for the Well.

Pursuant to Rule 435.a., Operator is required to submit a Form 6—Notice of Intent to Abandon (“Form 6-I”) prior to the abandonment of a well to allow COGCC Engineers to review and approve of well abandonment plans prior to commencement; and such Form 6-I approval remains valid for six months only. Pursuant to Rule 435.b, Operator is required to file a Form 6—Subsequent Report of Abandonment (Form 6-S”) within 30 days of abandonment. Pursuant to Rule 435.c., Operator subject to the same requirements for Form 6 as in Rules 435.a. & b. for re-entry of a plugged and abandoned well for the purpose of re-plugging the well.

If the Well has been plugged or abandoned, and Operator did not have valid COGCC approval of a Form 6-I for the abandonment (or re-plugging) or failed to report the required details of the abandonment via Form 6-S within 30 days after the abandonment (or re-plugging), Operator violated Rule 435.



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Multiple requests for documentation has not been received. Form 6 SROA is incomplete without required documentation and is not approvable with the current submittal.

**Required Corrective Action:** Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the COGCC Representative indicated below, confirming that all required Form 6s are submitted, accurate, and up-to-date; and detailing an internal procedure for timely compliance with Rule 435. in the future. Operator shall reference this Warning Letter document number in the subject of the email.

Operator shall also work with COGCC Engineering staff to ensure the Form 6s for the Well(s) contain the appropriate information, in the appropriate format, as deemed necessary by COGCC Engineering staff to approve the Form 6s.

**Corrective Action Deadline Date:** 09/17/2021

**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 Representative: Jacobson, Eric  
Email: [eric.jacobson@state.co.us](mailto:eric.jacobson@state.co.us)

Title: Central Region Engineer  
Phone Num: (303) 894-2100x5265

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

**Failure to Comply with Warning Letter:**

If Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above COGCC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 525, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

**Disclaimers:**

If the alleged violation(s) in this Warning Letter are the subject of previously issued Notice(s) of Alleged Violation ("NOAV") or Enforcement Order(s) ("Order"), Operator's obligations and the corrective actions and deadlines in such NOAV or Order stand and are not affected by this Warning Letter.

If issued in error, the Enforcement Unit reserves the right to rescind this Warning Letter prior to the COGCC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.

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

Sincerely,

Jacobson, Eric  
Central Region Engineer



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**Attachments**

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

**Document Number**   **Description**

402800537	WARNING LETTER DOCUMENTATION
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Total Attach: 1 Files