



**COLORADO**

**Oil & Gas Conservation  
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

www.colorado.gov/cogcc

## **WARNING LETTER # 403203337**

10/20/2022

PARADOX UPSTREAM LLC (# 10453)

SCOTT NOWAK

scottn@paradoxresources.com

500 DALLAS ST SUITE #1650

HOUSTON, TX 77002

ANDY'S MESA FEDERAL 15 (API# 113-06072)

NENW, 34, 44N, 16W, SAN MIGUEL

**This Warning Letter is to inform you that PARADOX UPSTREAM LLC (“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):**

34-60-121(1) CRS-b Statutory Violation - Permit Violation

Violation Date: 10/18/2022

Violation Discovery Date: 10/18/2022

Description of Alleged Violation: Pursuant to Colorado Revised Statutes ("C.R.S.") § 34-60-121(1)(a), PDC Energy, Inc. ("Operator") shall not violate this article, any rule or order of the commission, or any permit.

COGCC approved a Form 21 - Mechanical Integrity Test (Doc. No. 403169329) on September 18, 2022. The Form 21 had a Condition of Approval ("COA") stating, "Operator will submit a Form 5A with accurate tubing/packer configuration within 30 days, by 10/18/2022."

Operator failed to comply with the COA of the Form 21, violating § 34-60-121(1)(a).

Required Corrective Action: Within 30 days, Operator will submit a Form 5A - Completed Interval Report. The 5A will be fully describe the wellbore's completed interval, including the perforated interval and the tubing and packer configuration. Attach a current wellbore diagram. The 5A will also accurately list the date of first injection. Operator will contact the COGCC UIC Lead when the Form has been submitted.

Corrective Action Deadline Date: 11/20/2022



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**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: John Morgan

Title: UIC Lead & Geology Adviso

Phone Num: (303) 894-2100x5147

Email: [john.morgan@state.co.us](mailto:john.morgan@state.co.us)

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,

John Morgan  
UIC Lead & Geology Adviso

**Attachments**

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

**Document Number**    **Description**

403203418	WARNING LETTER DOCUMENTATION
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Total Attach: 1 Files