



**COLORADO**  
**Oil & Gas Conservation**  
**Commission**  
Department of Natural Resources  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Doc# 1352729

March 20, 2023

GREG WACHEL  
POLARIS PRODUCTION OPCO LLC  
100 GLENBOROUGH DR SUITE 442  
HOUSTON, TX 77067

RE Audit to Verify Compliance with COGCC Rules

Dear GREG WACHEL,

The Engineering Integrity Group of the Colorado Oil and Gas Conservation Commission (“COGCC”) has selected POLARIS PRODUCTION OPCO LLC for an audit regarding compliance with COGCC Rule 1101.d. Rule 1101.d regulates the registration, as-built specifications, and reporting of alignment changes of crude oil transfer lines and produced water transfer systems. This audit is focused specifically on produced water transfer systems.

We performed a desktop review of all produced water transfer systems in the COLORADO OIL AND GAS INFORMATION SYSTEM (“COGIS”) database that were noted to be operated by POLARIS PRODUCTION OPCO LLC to determine if any systems were missing updated Geographic Information System (GIS) data. We also checked GIS data for attributes that may not have been formatted correctly, thus reading as a NULL value in the database. During our review, we found that POLARIS PRODUCTION OPCO LLC may have at least one produced water transfer system that is either missing updated GIS data, or has incorrectly formatted attributes.

Attached is a list of produced water transfer systems that may require updated GIS data. Please review the associated comments and requirements for each system. If a GIS file is required, review your GIS files according to COGCC requirements prior to submittal. When submitting a Form 44, please note in the comments that the submittal is in response to this audit.

Please provide the requested information no later than March 31, 2023.

Please contact Ellice Devine at [ellice.devine@state.co.us](mailto:ellice.devine@state.co.us) or (303) 894-2100 x5190 if you have any questions.

Sincerely,

Mark Schlagenhauf, P.E.  
Engineering Integrity Supervisor  
Telephone: 303.894.2100 x5177  
[mark.schlagenhauf@state.co.us](mailto:mark.schlagenhauf@state.co.us)



Operator	Facility ID	System Name	Location	Comments	Requirements
POLARIS PRODUCTION OPCO LLC	478375	Snow King 9-32 project flowlines #	NWNE 7 7S54W 6 LINCOLN	Polaris needs to submit As Built Report. GIS data found with Form 44 #402638998.	Submit Form 44 Produced Water Transfer System As-Built Specification Report and include all requirements per Rule 1101.d.