



April 28, 2023

Via Email to: nikki.graber@state.co.us

Colorado Oil and Gas Conservation Commission
Department of Natural Resources
1120 Lincoln Street, Suite 801
Denver, CO 80203

Attn: Nikki Graber, DJ Basin Environmental Supervisor
RE: Warning Letter #403377537, issued 04/27/2023 — Spill Reporting

Dear Nikki Graber –

Verdad Resources LLC (“Verdad”) acknowledges receipt of COGCC Warning Letter No. 403377537 (the “Letter”) indicating compliance issues with COGCC Rule 912.b. Verdad understands that to comply with the Letter, an operator is required to complete the Corrective Actions identified in the Letter by the Corrective Action Deadline Date. This letter is Verdad’s notice to COGCC of completion of Corrective Actions. All Corrective Actions in the Letter have been completed or started prior to the Corrective Action Deadline Date of 04/29/2023 and are described in detail below with appropriate documented evidence.

Rule 912.b Required Corrective Action:

-Operator shall conduct an internal audit of its current Spill/Release Reporting, LGD Notification, and Surface Owner Notification procedures to ensure ongoing compliance with Rule 912 reporting requirements.

Verdad Response: Verdad has reviewed its records to conduct an internal audit of its current spill/release reporting and required notifications process. Verdad has determined that one aspect of the spill reporting and notification has failed. Verdad’s spill reporting personnel misunderstood rule 912.b.(1)E as it relates to 913.c.(9). Verdad discovered in its audit that we had one other historic spill discovered while operating under an open approved form 27. Verdad reported that historic spill on 4/28/23. The report form is attached as Exhibit A. All other aspects of Verdad’s spill/release reporting and required notifications process is working well.

- Operator shall provide an overview of its current Spill/Release Reporting, LGD Notification, and Surface Owner Notification procedures including any changes that have been made in response to this warning letter to the COGCC via an eForm 4 Sundry Notice to Area EPS Chris Canfield within 60 days of the issuance of this warning letter.

Verdad Response: Verdad submitted an eForm 4 Sundry Notice to Area EPS Chris Canfield with an overview of its current Spill/Release Reporting, LGD Notification, and Surface Owner Notification procedures including any changes that have been made in response to this warning letter. The form 4 is attached as Exhibit B.

Exhibit A is attached to this response for the COGCC’s benefit as evidence of the audit findings correction reporting.

Exhibit B is attached to this response for the COGCC’s benefit as evidence of the Form 4 submitted providing Verdad spill procedure.

Should you, or any of the COGCC staff have any questions or concerns with regard to this response, please don’t hesitate to contact me at the contact information below for a meeting or follow-up.

In closing, Verdad Resources LLC places utmost importance on operations and reporting compliance. We will continue to make improvements with our processes going forward to prevent the compliance issues cited in the Letter.

A follow up response letter will be sent to you confirming the completion of all initiated Corrective Actions.

Respectfully –

Michael Cugnetti
Director of EHS&R
Verdad Resources LLC
1125 17th Street, Ste. 550
Denver, CO 80202
Direct: 720-845-6901
Email: mcugnetti@verdadresources.com

Exhibit A

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

403388392

Date Received:

04/28/2023

Spill report taken by:

Spill/Release Point ID:

SPILL/RELEASE REPORT (INITIAL)

This form is to be submitted by the party responsible for the oil and gas spill or release. Refer to COGCC Rule 912.b. for reporting requirements of spills or releases of E&P Waste, produced Fluids, or unauthorized Releases of natural gas. Submit a Site Investigation and Remediation Workplan (Form 27) if Rule 913.c. applies.

OPERATOR INFORMATION

Name of Operator: VERDAD RESOURCES LLC	Operator No: 10651	Phone Numbers
Address: 1125 17TH STREET SUITE 550		Phone: (720) 8456901
City: DENVER State: CO Zip: 80202		Mobile: ()
Contact Person: Michael Cugnetti		Email: mcugnetti@verdadresources.com

INITIAL SPILL/RELEASE REPORT

Initial Spill/Release Report Doc# 403388392

Initial Report Date: 04/28/2023	Date of Discovery: 03/20/2023	Spill Type: Historical Release
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Spill/Release Point Location:

QTRQTR SWSE SEC 7 TWP 1S RNG 65W MERIDIAN 6

Latitude: 39.975255 Longitude: -104.703794

Municipality (if within municipal boundaries): County: ADAMS

Enter Lat./long measurement of the actual Spill/Release Point. Lat./Long. Data shall meet standards of Rule 216.

Reference Location:

Facility Type: OIL AND GAS LOCATION	<input checked="" type="checkbox"/> Facility/Location ID No 320215
Spill/Release Point Name: Edna 1	<input type="checkbox"/> Well API No. (Only if the reference facility is well) 05- -
	<input type="checkbox"/> No Existing Facility or Location ID No.

Estimated Total Spill Volume: use same ranges as others for values

Estimated Oil Spill Volume(bbl): Unknown	Estimated Condensate Spill Volume(bbl): Unknown
Estimated Flow Back Fluid Spill Volume(bbl): 0	Estimated Produced Water Spill Volume(bbl): Unknown
Estimated Other E&P Waste Spill Volume(bbl): 0	Estimated Drilling Fluid Spill Volume(bbl): 0

Specify:

Has the subject Spill/Release been controlled at the time of reporting? Yes

Land Use:

Current Land Use: NON-CROP LAND Other(Specify):

Weather Condition: Sunny, cool and breezy

Surface Owner: FEE Other(Specify):

Describe what is known about the spill/release event (what happened -- including how it was stopped, contained, and recovered):

Historic spill discovered during facility decommissioning. Well is P&A'd, all equipment off site.

List of Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11):

OTHER NOTIFICATIONS

<u>Date</u>	<u>Agency/Party</u>	<u>Contact</u>	<u>Phone</u>	<u>Response</u>
4/28/2023	Adams County	Greg Dean	-	emailed, no response
3/20/2023	Landowner	Jim Green	-	approved remediation work

REPORT CRITERIA

Rule 912.b.(1) Report to the Director (select all criteria that apply):

No Rule 912.b.(1).A: A Spill or Release of any size that impacts or threatens to impact any Waters of the State, Public Water System, residence or occupied structure, livestock, wildlife, or publicly-maintained road.

Waters of the State: _____ Public Water System: _____
Residence or Occupied Structure: _____ Livestock: _____
Wildlife: _____ Publicly-Maintained Road: _____

No Rule 912.b.(1).B: A Spill or Release in which 1 barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

No Rule 912.b.(1).C: A Spill or Release of 5 barrels or more of E&P Waste or produced Fluids regardless of whether the Spill or Release is completely contained within berms or other secondary containment.

No Rule 912.b.(1).D: Within 6 hours of discovery, a Grade 1 Gas Leak. For a Grade 1 Gas Leak from a Flowline, the Operator also must submit the Form 19 – Initial, document number on a Form 44, Flowline Report, for the Grade 1 Gas Leak

Enter the approximate time of discovery _____ (HH:MM)
Enter the Document Number of the Grade 1 Gas Leak Report, Form 44 _____
Was there a reportable accident associated with either a Grade 1 Gas Leak or an E&P waste spill or release? _____
Enter the Document Number of the Initial Accident Report, Form 22 _____
Was there damage during excavation? _____
Was CO 811 notified prior to excavation? _____

Yes Rule 912.b.(1).E: The discovery of 10 cubic yards or more of impacted material resulting from a current or historic Spill or Release. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards.

Estimated Volume of Impacted Solids (cu. yd.): _____ 1000

No Rule 912.b.(1).F: The discovery of impacted Waters of the State, including Groundwater. Discovery and reporting will not be contingent upon confirmation samples demonstrating exceedance of Table 915-1 standards. The presence of free product or hydrocarbon sheen on Groundwater or surface water is reportable. The presence of contaminated soil in contact with Groundwater or surface water is reportable. Check all that apply:

- The presence of free product or hydrocarbon sheen Surface Water
- The presence of free product or hydrocarbon sheen on Groundwater
- The presence of contaminated soil in contact with Groundwater
- The presence of contaminated soil in contact with Surface water

No	Rule 912.b.(1).G: A suspected or actual Spill or Release of any volume where the volume cannot be immediately determined, including a spill or release of any volume that daylight from the subsurface.
No	Rule 912.b.(1).H: Spill or Release resulting in vaporized hydrocarbon mists that leave the Oil and Gas Location or Off-Location Flowline right of way from an Oil and Gas Location and impacts or threatens to impact off-location property. <input type="checkbox"/> Areas offsite of Oil & Gas Location <input type="checkbox"/> Off-Location Flowline right of way
No	Rule 912.b.(1).I: A Release of natural gas that results in an accumulation of soil gas or gas seeps.
No	Rule 912.b.(1).J: A Release that results in natural gas in Groundwater.

OPERATOR COMMENTS:

This missing spill report was discovered during a spill reporting audit done as a corrective action from Warning Letter #403377537. This cleanup and records are being done documented and closed via Remediation Project #20114

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.
 Signed: _____ Print Name: Michael Cugnetti
 Title: Director of EHS&R Date: 04/28/2023 Email: mcugnetti@verdadresources.com

<u>COA Type</u>	<u>Description</u>
0 COA	

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403388392	FORM 19 SUBMITTED

Total Attach: 1 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

Exhibit B

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: 403387903			
Date Received: 04/28/2023			

SUNDRY NOTICE

This form is required for reports, updates, and requests as specified in the COGCC rules. It is also used to request changes to some aspects of approved permits for Wells and Oil and Gas Locations.

OGCC Operator Number: <u>10651</u>	Contact Name <u>Michael Cugnetti</u>
Name of Operator: <u>VERDAD RESOURCES LLC</u>	Phone: <u>(720) 845-6901</u>
Address: <u>1125 17TH STREET SUITE 550</u>	Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>mcugnetti@verdadresources.com</u>

FORM 4 SUBMITTED FOR:

Facility Type: LOCATION

API Number : 05- 001 00 ID Number: 320179

Name: GREAT WESTERN GREEN Number: 1

Location QtrQtr: SWSW Section: 7 Township: 1S Range: 65W Meridian: 6

County: ADAMS Field Name: WATTENBERG

Oil & Gas Location(s) and Oil & Gas Development Plan (OGDP) Information

Location(s)

Location ID	Location Name and Number
320179	GREAT WESTERN GREEN 1

OGDP(s)

No OGDP

WELL LOCATION CHANGE OR AS-BUILT GPS REPORT

Change of Location for Well * As-Built GPS Location Report As-Built GPS Location Report with Survey

* Well Location Change requires a new Plat.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude _____ Longitude _____

GPS Quality Value: _____ Type of GPS Quality Value: _____ Measurement Date: _____

Well Ground Elevation: _____ feet (Required for change of Surface Location.)

WELL LOCATION CHANGE

Well plan is: _____ (Vertical, Directional, Horizontal)

				FNL/FSL		FEL/FWL	
Change of Surface Footage From :				<input type="text" value="1050"/>	<input type="text" value="FSL"/>	<input type="text" value="990"/>	<input type="text" value="FWL"/>
Change of Surface Footage To :				<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Current Surface Location From	QtrQtr <input type="text" value="SWSW"/>	Sec <input type="text" value="7"/>	Twp <input type="text" value="1S"/>	Range <input type="text" value="65W"/>	Meridian <input type="text" value="6"/>		
New Surface Location To	QtrQtr <input type="text"/>	Sec <input type="text"/>	Twp <input type="text"/>	Range <input type="text"/>	Meridian <input type="text"/>		
Change of Top of Productive Zone Footage From :				<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Change of Top of Productive Zone Footage To :				<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Current Top of Productive Zone Location		Sec <input type="text"/>	Twp <input type="text"/>	Range <input type="text"/>			
New Top of Productive Zone Location		Sec <input type="text"/>	Twp <input type="text"/>	Range <input type="text"/>			

**

Change of **Base of Productive Zone** Footage **From:**

Change of **Base of Productive Zone** Footage **To:**

**

Current **Base of Productive Zone** Location

Sec

Twp

Range

New **Base of Productive Zone** Location

Sec

Twp

Range

Change of **Bottomhole** Footage **From:**

Change of **Bottomhole** Footage **To:**

**

Current **Bottomhole** Location

Sec

Twp

Range

** attach deviated drilling plan

New **Bottomhole** Location

Sec

Twp

Range

SAFETY SETBACK INFORMATION

Required for change of Surface Location.

Distance from Well to nearest:

- Building: _____ Feet
- Building Unit: _____ Feet
- Public Road: _____ Feet
- Above Ground Utility: _____ Feet
- Railroad: _____ Feet
- Property Line: _____ Feet

INSTRUCTIONS:

- Specify all distances per Rule 308.b.(1).
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit – as defined in 100 Series Rules.

SUBSURFACE MINERAL SETBACKS

Required for change of Top and/or Base of Productive Zone. Enter 5280 for distance greater than 1 mile.

Is this Well within a unit? _____

If YES:

Enter the minimum distance from the Completed Zone of this Well to the Unit Boundary: _____ Feet

Enter the minimum distance from the Completed Zone of this Well to the Completed Zone of an offset Well within the same unit permitted or completed in the same formation: _____ Feet

If NO:

Enter the minimum distance from the Completed Zone of this Well to the Lease Line of the described lease: _____ Feet

Enter the minimum distance from the Completed Zone of this Well to the Completed Zone of an offset Well producing from the same lease and permitted or completed in the same formation: _____ Feet

Exception Location

If this Well requires the approval of a Rule 401.c Exception Location, enter the Rule or spacing order number and attach the Exception Location Request and Waivers. _____

LOCATION CHANGE COMMENTS

OTHER

RULE 502 VARIANCE

Order Number: _____

Description:

REMOVE FROM SURFACE BOND **Signed surface use agreement is a required attachment**

CHANGE NAME OR NUMBER OF WELL, FACILITY, OIL & GAS LOCATION, OR OGD

From: Name GREAT WESTERN GREEN Number 1 Effective Date: _____

To: Name _____ Number _____

ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.

WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number _____ has not been drilled.

PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number _____ has not been constructed (Permitted and constructed pit requires closure per Rule 911)

CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number _____ has not been constructed (Constructed facility requires closure per Rule 907)

OIL & GAS LOCATION ID Number: _____

Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.

REQUEST FOR WELL RECORDS CONFIDENTIALITY (Rule 206.c.(1))

DIGITAL WELL LOG UPLOAD

DOCUMENTS SUBMITTED Purpose of Submission: Attn Chris Canfield - Warning Letter #403377537 Corrective Action _____

COMPLIANCE with CONDITION OF APPROVAL (COA) on Form NO: _____ Document Number: _____

RECLAMATION

INTERIM RECLAMATION

Interim Reclamation will commence approximately _____

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

Field inspection will be conducted to document Rule 1003.e. compliance

FINAL RECLAMATION

Final Reclamation will commence approximately _____

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

Field inspection will be conducted to document Rule 1004.c. compliance

Comments:

ENGINEERING AND ENVIRONMENTAL WORK

REPORT OF TEMPORARY ABANDONMENT

Describe the method used to ensure that the Well is closed to the atmosphere and the Operator's plans for future operation of the Well in the COMMENTS box below as required by Rule 434.b.(1).

REQUEST FOR TEMPORARY ABANDONMENT EXCEEDING 6 MONTHS

State the reason for the extension request and explain the Operator's plans for future operation of the Well in the COMMENTS box below as required by Rule 434.b.(3).

Date well temporarily abandoned _____

Has Production Equipment been removed from site? _____

Mechanical Integrity Test (MIT) required. Date of last MIT _____

TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

NOTICE OF INTENT/REQUEST FOR APPROVAL Approximate Start Date _____

SUBSEQUENT REPORT Date of Activity _____

- | | | |
|---|--|--|
| <input type="checkbox"/> Bradenhead Plan | <input type="checkbox"/> Venting or Flaring (Rule 903) | <input type="checkbox"/> E&P Waste Mangement |
| <input type="checkbox"/> Change Drilling Plan | <input type="checkbox"/> Repair Well | <input type="checkbox"/> Beneficial Reuse of E&P Waste |
| <input type="checkbox"/> Gross Interval Change | | |
| <input type="checkbox"/> Underground Injection Control | | |
| <input type="checkbox"/> Request approval of Reuse and Recycling Plan per Rule 905.a.(3). (Reuse and Recycling Plan must be attached.) | | |
| <input type="checkbox"/> Request approval of Alternative Sampling Plan per Rule 909.j.(6). for this Pit. (Alternative Sampling Program must be attached.) | | |
| <input type="checkbox"/> Other | | |

Request that an existing produced water sample from the same formation be used per Rule 909.j.(6) to meet the requirements of Rule 909.j.(1)-(5) for this Well.

Pit ID _____ Pit Name _____

(No Sample Provided)

Subsequent well operations with heavy equipment (Rule 312)

(No Well Provided)

COMMENTS:

GAS CAPTURE

VENTING AND FLARING:

Operation type: _____ Operational phase requiring venting/flaring: _____

Reason for venting/flaring: _____

Describe Other reason for venting/flaring:

Describe why venting or flaring is necessary. If reporting per Rule 903.b.(2), 903.c.(3).C, or 903.d.(2), include the explanation, rationale, and cause of the event:

Describe how the operation will protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. If reporting per Rule 903.d.(2), include BMPs used to minimize venting on the BMP Tab:

Total volume of gas vented or flared: _____ mcf estimated measured

Total duration of emission event: _____ hours consecutive cumulative

Submit a single representative gas analysis via Form 43 to create a Sample Site Facility ID# for this Location. Reference the Form 43 document number on the Related Forms tab.

Sample Site Facility ID#: _____

GAS CAPTURE PLAN

Describe the plan to connect to a gathering line or beneficially use the gas; include anticipated timeline:

A Gas Capture Plan that meets the requirements of Rule 903.e is attached.

H2S REPORTING

Intentional release of H2S gas due to Upset Condition or malfunction.

Intent to temporarily abandon well with potential H2S concentration >100 ppm.

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

Gas Analysis Report must be attached.

H2S Concentration: _____ in ppm (parts per million)

Date of Measurement or Sample Collection _____

Description of Sample Point:

Absolute Open Flow Potential _____ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: _____

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: _____

COMMENTS:

OIL & GAS LOCATION UPDATES

SITE EQUIPMENT LIST UPDATES

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells _____	Oil Tanks _____	Condensate Tanks _____	Water Tanks _____	Buried Produced Water Vaults _____
Drilling Pits _____	Production Pits _____	Special Purpose Pits _____	Multi-Well Pits _____	Modular Large Volume Tank _____
Pump Jacks _____	Separators _____	Injection Pumps _____	Heater-Treaters _____	Gas Compressors _____
Gas or Diesel Motors _____	Electric Motors _____	Electric Generators _____	Fuel Tanks _____	LACT Unit _____
Dehydrator Units _____	Vapor Recovery Unit _____	VOC Combustor _____	Flare _____	Enclosed Combustion Devices _____
Meter/Sales Building _____	Pigging Station _____	Vapor Recovery Towers _____		

OTHER PERMANENT EQUIPMENT UPDATES

OTHER TEMPORARY EQUIPMENT UPDATES

CULTURAL AND SAFETY SETBACK UPDATES

OTHER LOCATION CHANGES AND UPDATES

Provide a description of other changes or updates to technical information for this Location:

POTENTIAL OGD UPDATES

PROPOSED CHANGES TO AN APPROVED OGD

This Sundry Form 4 is being submitted pursuant to Rule 301.c to propose changes to an approved Oil and Gas Development Plan.

Check all boxes that pertain to the type(s) of changes being proposed for this OGD:

- | | |
|--|--|
| <input type="checkbox"/> Add Oil and Gas Location(s) | <input type="checkbox"/> Add Drilling and Spacing Unit(s) |
| <input type="checkbox"/> Amend Oil and Gas Location(s) | <input type="checkbox"/> Amend Drilling and Spacing Unit(s) |
| <input type="checkbox"/> Remove Oil and Gas Location(s) | <input type="checkbox"/> Remove Drilling and Spacing Unit(s) |
| <input type="checkbox"/> Oil and Gas Location attachment or plan updates | <input type="checkbox"/> Amend the lands subject to the OGD |
| <input type="checkbox"/> Other | |

Provide a detailed description of the changes being proposed for this OGD. Attach supporting documentation such as maps if necessary.

Best Management Practices

No BMP/COA Type

Description

<u>No BMP/COA Type</u>	<u>Description</u>

Operator Comments:

Attn Chris Canfield - Warning Letter #403377537 Corrective Action

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: Michael Cugnetti
 Title: Director of EHS&R Email: mcugnetti@verdadresources.com Date: 4/28/2023

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.
 COGCC Approved: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY:

<u>COA Type</u>	<u>Description</u>
0 COA	

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
403387903	FORM 4 SUBMITTED
403388553	OTHER

Total Attach: 2 Files

- All Verdad employees and contractors are trained on spill procedures at hiring and on boarding.
- Spill prevention and reporting requirement training occurs annually with Verdad Operation teams.
- Contractors undergo periodic contractor training and audits where spill prevention and reporting requirements are covered.
- Spill incidents are discussed and lessons learned are shared at monthly safety meetings.

Procedures

- Any spill discovered or caused shall be immediately stopped at the source if on going and safe to do so.
- Any spill discovered or caused shall be immediately cleaned up and properly disposed of.
- Spill volume shall be determined. If unable to determine spill size call your supervisor (employee) or Verdad hiring manager (contractor) and Verdad EH&S staff.
- If spill is greater than 1 BBL (or 10 gal. of refined product or chemical) call your supervisor (employee) or Verdad hiring manager (contractor) and Verdad EH&S staff.
- Verdad EH&S staff will determine if spill is reportable.
- Verdad EH&S staff will notify the Director of EHS&R to submit the 24 Hr COGCC reporting and notification requirements to local governments, surface owners and CPW if applicable.
- If the Director is unavailable the EH&S Field Manager will report the spill and make notifications.
- Director of EHS&R will direct the cleanup follow through, records collection, and submit subsequent reporting and request for closure or conversion to a remediation project, form 27.

Changes to Spill Reporting and Notification Procedures in response to Warning Letter #403377537

- Director of EHS&S and Field EH&S Manager reviewed COGCC 912 Rules to ensure full understanding and future compliance, particularly rule 912.b.(1)E as it relates to 913.c.(9).