



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 403755813

04/16/2024

COPPER LAND RESOURCES LLC (# 10808)

JOSH JANY

jdjany@hotmail.com

9470 HOMESTEAD DR

FREDERICK, CO 80504

SCHWARTZ, DOROTHY 1 (API# 121-05420)

SENE, 28, 3S, 50W, WASHINGTON

This Warning Letter is to inform you that COPPER LAND RESOURCES LLC (“Operator”) may be in violation of the rules and regulations of the Colorado Energy and Carbon Management Commission (“ECMC”) and corrective action is required.

ECMC 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 ECMC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

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

417 Mechanical Integrity Testing

Violation Date: 04/15/2024

Violation Discovery Date: 04/16/2024

Description of Alleged Violation: Failed test according to Field Inspection doc# 711900561, Inspection date 04/15/2024.

All Wells will maintain mechanical integrity. All Wells which lack mechanical integrity, as determined through a mechanical integrity test, or other means, will be repaired or Plugged and Abandoned within 6 months. If an Operator has performed a mechanical integrity test within the 2 years required for Shut-in Wells or the 30 days required for Temporarily Abandoned Wells by this Rule, the Operator will have 6 months from the date of the unsuccessful test to make repairs or Plug and Abandon the Well. If the Operator has not performed a mechanical integrity test within the required time frames in Rules 417.b.(1) & c.(1), the Operator will not be given an additional 6 months in the event of an unsuccessful test.

Mechanical integrity test pressure loss or gain will not exceed 10% of the initial stabilized surface pressure over a test period of 15 minutes. The test may be repeated if the pressure loss or gain is determined to be the result of compression related to gas dissolution from the Fluid column or temperature effects related to the Fluid used to load the column. Wells that do not satisfy this test requirement are considered to lack mechanical integrity and are subject to the requirements of Rule 417.f.



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

Required Corrective Action: All Wells which lack mechanical integrity, as determined through a mechanical integrity test, or other means, will be repaired or Plugged and Abandoned within 6 months.

Operator shall Shut-in and lock-out tag-out the Well to prevent further injection until well passes successful MIT or is Plugged and Abandoned.
Corrective Action Deadline Date: 10/15/2024

418 Form 21, Mechanical Integrity Test

Violation Date: 04/15/2024

Violation Discovery Date: 04/16/2024

Description of Alleged Violation: Failed test according to Field Inspection 711900561, Inspection date 04/15/2024.

Operator is receiving this letter because, based on ECMC records, ECMC 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 Forms or Notices related to mechanical integrity test ("MIT") are outstanding for this Well.

Required Corrective Action: Results of all mechanical integrity tests, including tests that show a lack of integrity, will be submitted on Form 21, Mechanical Integrity Test, within 30 days after the test.

Corrective Action Deadline Date: 05/15/2024

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 ECMC staff identified below by the Corrective Action Deadline Date(s):

ECMC Representative: Haverkamp, Curtis

Title: Underground Injection Coo

Phone Num: (720) 786-5560x

Email: curtis.haverkamp@state.co.us

If you have any questions about this Warning Letter, please contact the ECMC 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 ECMC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC 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 ECMC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.



COLORADO
Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

All well data, rules and forms are available on our website at www.colorado.gov/ecmc.

Sincerely,

Haverkamp, Curtis
Underground Injection Co

Attachments

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

Document Number **Description**

<u>Document Number</u>	<u>Description</u>

Total Attach: 0 Files