



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 403851750

07/11/2024

PETRO OPERATING COMPANY LLC (#10583)

ROGER PARKER

rogeraparker9@aol.com

9033 E EASTER PLACE SUITE 112

CENTENNIAL, CO 80112-2105

Corey, Alex (alex.corey@iptenergyservices.com)

NWNW, 30, 2N, 66W, WELD

This Warning Letter is to inform you that PETRO OPERATING COMPANY 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):

912. Spills and Releases

Violation Date: 04/01/2024

Violation Discovery Date: 07/02/2024

Description of Alleged Violation: Pursuant to Rule 912.b.(3), Petro Operating Company LLC (“Operator”) will submit a Form 19 – Initial no less than 72 hours after discovery of the Spill or Release unless the Director extends the timeframe in writing.

On April 15, 2024, Operator submitted a Form 27 (document no. 403753802) for the Counter 1 AD TB and Pit Tank Battery (API 123-08076; the “Location”) the information provided indicated a historical release was encountered at sample point “W TANK” and “E TANK” with a spill discovery date of April 1, 2024. To date Operator has not reported the spill per Rule 912.b.

Operator failed to submit a Form 19 - Initial within 72 hours after the discovery of a Spill or Release, violating Rule 912.b.(3).

Required Corrective Action: Operator will immediately submit a Form 19 for discovery of historical impacts and comply with all conditions of approval and corrective actions for all remaining remediation of soil impacts, reclamation and reporting established for ECMC Remediation Project #33683.

Corrective Action Deadline Date: 07/14/2024



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

ECMC Representative: Laurel Anderson
Email: laurel.anderson@state.co.us

Title: NE Environmental Protecti
Phone Num: (970) 404-9911x

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.

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

Sincerely,

Laurel Anderson
NE Environmental Protecti

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