



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 403961345

10/17/2024

LOGOS OPERATING LLC (# 10679)

VANESSA FIELDS

vfields@logosresourcesllc.com

2010 AFTON PLACE

FARMINGTON, NM 87401

DOCAR GAS UNIT 2 (API# 067-05267)

SWSE, 26, 33N, 8W, LA PLATA

This Warning Letter is to inform you that LOGOS OPERATING 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):

419 Bradenhead Monitoring, Testing, and Reporting

Violation Date: 10/17/2024

Violation Discovery Date: 10/17/2024

Description of Alleged Violation: BRADENHEAD MONITORING, TESTING, AND REPORTING 419 (4) Through the Remaining Life of the Well. For all Wells in the state, an Operator will monitor and record production casing pressure and all annular casing pressures on a monthly basis or at a Director-approved frequency. If a Well’s Bradenhead pressure is greater than 30% of the TVD in feet of the surface casing shoe expressed in psig, or a lower threshold set by a Commission order, or if a Well flows liquids or continuous gas from the Bradenhead Annulus, an Operator will:

- A. Report the Bradenhead pressure to the Director on a Form 17, Bradenhead Test Report;
- B. Take immediate action to remedy such an annular pressure; and
- C. Perform diagnostic testing to determine if the annular casing pressure is sustained. An Operator will report diagnostic testing results to the Director on a Form 4 within 60 days of submitting a Form 17 pursuant to Rule 419.b.(4).A. If the diagnostic testing confirms sustained casing pressure, an Operator will develop and implement a pressure management plan and provide the plan with the Form 4.

Operator has failed to establish monthly Bradenhead monitoring for this well.

Required Corrective Action: Operator shall review its records to verify if any Forms or Notices related to



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Bradenhead monitoring were completed or are still outstanding for this Well. Operator should review all wells for these requirements.

Additionally, Operator shall send an email to the ECMC Representative indicated below, detailing an internal procedure for timely compliance with Rule 419. Operator shall reference this Warning Letter document number in the subject of the email.

If the Bradenhead test requirements do not apply per rule 614.e or tribal involvement, please email a list of those wells to the area engineer with the reason the test is not required.

Guidance for Rule 419 is available on the ECMC website at:
Regulation – Operator Guidance - BRADENHEAD MONITORING , TESTING , MITIGATION, AND REPORTING

<http://ecmc/documents/reg/OpGuidance/Operator%20Guidance%20for%20Bradenhead%20Monitoring%20Testing%20Reporting.pdf>

If Bradenhead testing cannot be performed a Variance to Rule 419 is required.

Corrective Action Deadline Date: 10/31/2024

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: Wang, Jian
Email: jian.wang@state.co.us

Title: West Area Engineer
Phone Num: (303) 551-5570x

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,



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Wang, Jian
West Area Engineer

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