



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 403638910

02/13/2025

FRITZ & DIGMAN INC (# 31250)
REBECCA DIGMAN
rcdigman@yahoo.com

PO BOX 70024
ALBUQUERQUE, NM 87197-0024

GRIFFITH, DELLA 1 (API# 067-05264)
SWSW, 27, 33N, 12W, LA PLATA

This Warning Letter is to inform you that FRITZ & DIGMAN INC (“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):

1101.b. Off-Location Flowline Registration

Violation Date: 01/10/2024

Violation Discovery Date: 01/10/2024

Description of Alleged Violation: Rule 1101.b. If Domestic Well has an off-location flowline associated with the well, flowline must be registered.

1101.b. Off-Location Flowline Registration. (1) An operator must register every off-location flowline either individually or as part of a flowline system. An operator may register individual off-location flowlines or a flowline system by submitting a Flowline Report, Form 44, to the Director within 90 days after the flowline or flowline system is placed in active status. An off-location flowline registered as part of a produced water transfer system is not subject to this requirement.

Required Corrective Action: Operator shall register any off-location flowline associated the Domestic Well.

Corrective Action Deadline Date: 02/28/2025

1101.c. Domestic Tap Registration

Violation Date: 01/10/2024

Violation Discovery Date: 01/10/2024



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Description of Alleged Violation: Rule 1101.c. If there are domestic taps associated with the Domestic Well operator must assure that those taps are properly registered.

1101.c. Domestic Tap Registration. (1) Within 90-days of installation or discovery of a domestic tap connected to the operator's flowline, an operator must submit a Flowline Report, Form 44, to the Director to register the tap. The registration must include the latitude and longitude of the flowline or wellhead connection for the domestic tap and the street address or the latitude and longitude of the point of delivery.

(2) For domestic taps installed after May 1, 2018, an operator must register the domestic tap pursuant to subpart (1) and notify the domestic tap owner in writing that the domestic tap must include all subparts A. – F.

Required Corrective Action: Operator shall register any domestic tap associated the Domestic Well by submitting a Flowline Report Form 44.

Corrective Action Deadline Date: 02/28/2025

205. Operator Registration

Violation Date: 12/28/2023

Violation Discovery Date: 12/28/2023

Description of Alleged Violation: Rule 205. c. Form 1B, Annual Registration. (1) An Operator that has filed a Form 1 and is operating one or more Wells will file a Form 1B, Annual Registration by no later than August 1, 2022. Beginning in 2023, an Operator will file a Form 1B no later than April 30 of each year.

(2) On the same day the Operator files its Form 1B, the Operator will remit its Mitigation Fee to the Orphan Well Mitigation Enterprise consistent with the procedures adopted by the Enterprise Board.

Required Corrective Action: Operator shall confirm submission of Form 1B for years 2022 and 2023, any missing Form 1Bs are to be submitted. Operator shall remit any Mitigation Fees that are due for 2022 and 2023.

Corrective Action Deadline Date: 02/28/2025

219 Form 10, Certificate of Clearance

Violation Date: 09/11/2024

Violation Discovery Date: 09/11/2024

Description of Alleged Violation: No current transporter registered for well.

Required Corrective Action: Operator is to update all transporters and gatherers for this well with a Form 10 Certificate of Clearance.

Corrective Action Deadline Date: 02/28/2025

419 Bradenhead Monitoring, Testing, and Reporting

Violation Date: 01/17/2025

Violation Discovery Date: 01/17/2025

Description of Alleged Violation: Pursuant to Rule 419, all wells will have an annual Bradenhead test reported to the ECMC.



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As the operator of record, you have failed to report a Bradenhead test for [2022-2024] at one or more wells.

Required Corrective Action: Operator shall review its records to verify if any Forms or Notices related to Bradenhead testing were late or are still outstanding for these Wells. Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports.

Where Operator has failed to perform a Bradenhead Test in 2022-2024, a test shall be performed by the Corrective Action Date listed below. Pursuant to Rule 420, Operator is required to submit the results of BH tests to ECMC within 10 days of completion. Operator shall submit such results by filing a Bradenhead Test Report, Form 17, which shall include a wellbore diagram if not previously submitted or if the wellbore configuration has changed, and the results of any gas and liquid analysis, if sampled.

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.

Notes: This test or missing form is being accepted in lieu of the required [2022-2024] Bradenhead test. The operator must still perform an additional Bradenhead test by December 31, [2025], for the [2022-2024] Bradenhead test.

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.

Please send questions to dnr_ECMC_outreach@state.co.us

Corrective Action Deadline Date: 02/28/2025

702 General

Violation Date: 01/10/2024

Violation Discovery Date: 01/10/2024

Description of Alleged Violation: Rule 702.b. Form 3, Financial Assurance Plan. Operators of 1 or more Wells will file Financial Assurance Plans as required by this Rule 702.b. Each Financial Assurance Plan will demonstrate how the Operator is financially capable of fulfilling its obligations under the Act and the Commission's Rules.

Required Corrective Action: Operator shall file Form 3 Financial Assurance Plan.

Corrective Action Deadline Date: 02/28/2025



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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: Meredith Greager

Title: Engineering Specialist

Phone Num: ()

Email: meredith.greager@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.

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

Sincerely,

Meredith Greager
Engineering Specialist

Attachments

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

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

Total Attach: 0 Files