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## Apex Oil Ventures - Bradenhead Testing Requirements

1 message

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**Schroeder - DNR, Siera** <siera.schroeder@state.co.us>

Wed, Apr 9, 2025 at 10:57 AM

To: jec-apex@outlook.com

Cc: andy@qualityoilproperties.com, t.rasmussen1@outlook.com, Curtis Haverkamp - DNR <curtis.haverkamp@state.co.us>

Good morning,

My name is Siera Schroeder and I am an enforcement advisor with ECMC. I am reaching out because an NOAV was issued to Apex on December 13, 2022 for failure to conduct bradenhead testing in 2021. ECMC received a response from Apex stating its wells were exempt from the testing requirements.

I have discussed this with Staff and while we agree that Apex had an approved Form 4 exempting it from bradenhead testing, this was not the appropriate avenue to receive an exception. Beginning in 2021, ECMC rules required operators to obtain a variance through a hearing if they wished to obtain an exception from any ECMC rules, including bradenhead testing.

ECMC Staff have decided to honor the exception granted to Apex for the bradenhead testing requirements for 2021-2024. However, beginning this year - 2025, Apex will need to obtain a variance from the commission if it wishes to maintain its bradenhead exception. Apex's failure to obtain a variance and/or failure to conduct bradenhead testing beginning in 2025, will result in an NOAV against Apex.

Once Apex applies for a variance, please alert me and Enforcement Staff will dismiss the NOAV that was issued on December 13, 2022. Please provide a response to this email no later than the end of the day on April 16th.

Thank you,

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**Siera Schroeder**  
Enforcement Advisor  
she/her/hers



**COLORADO**  
Energy & Carbon Management  
Commission  
Department of Natural Resources

P: 719.723.1542

1120 Lincoln Street, Suite 801, Denver, CO 80203

[siera.schroeder@state.co.us](mailto:siera.schroeder@state.co.us) | [www.colorado.gov/ecmc](http://www.colorado.gov/ecmc)