



# COLORADO

## Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

www.colorado.gov/ecmc

### WARNING LETTER # 404257664

06/30/2025

OGRIS OPERATING LLC (# 10758)

GIENA WARD

gward@ogrisop.com

PO BOX 53467

MIDLAND, TX 79710

APACHE CANYON 23-11 (API# 071-06343)

NESW, 23, 34S, 68W, LAS ANIMAS

**This Warning Letter is to inform you that OGRIS 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):

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| <p>1105 Abandonment</p> <p><u>Violation Date:</u> 06/26/2025</p> <p><u>Violation Discovery Date:</u> 06/26/2025</p> <p><u>Description of Alleged Violation:</u> 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 present one or more compliance issues. Operator should review its records to verify if any Forms or Notices related to Abandonment were inaccurate or are still outstanding for these Wells. Per the Flowline and site closure Conditions of Approval for the Form 6, Notice of Intent to Abandon, Consistent with Rule 911.a, a Form 27 must be approved prior to cut and cap, conducting flowline abandonment, or removing production equipment. Allow 30 days for Director review of the Form 27; include the Form 27 document number on the Form 44 for offsite flowline abandonment (if applicable) and on the Form 6 Subsequent. Properly abandon flowlines per Rule 1105. If flowlines will be abandoned in place, include with the Form 27: pressure test results conducted in the prior 12 months as well as identification of any document numbers for a COGCC Spill/Release Report, Form 19, associated with the abandoned line.</p> <p>Operator did not indicate whether flowline abandonment was conducted or not on the Form 6 subsequent.</p> <p><u>Required Corrective Action:</u> Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the ECMC Representative indicated</p> |
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below, detailing an internal procedure for timely compliance with Rule 1105. Operator shall reference this Warning Letter document number in the subject of the email.  
Corrective Action Deadline Date: 07/30/2025

### 420 Form 17, Bradenhead Test Report

Violation Date: 06/26/2025

Violation Discovery Date: 06/26/2025

Description of Alleged Violation: 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 present one or more compliance issues. Operator should review its records to verify if any Forms or Notices related to Bradenhead (“BH”) testing were late or are still outstanding for these Wells.

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”), and 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.

If Operator performed a BH test and failed to submit Form 17 within 10 days of the test date, Operator violated Rule 420.

Per Bradenhead Conditions of Approval from Form 6, Intent to Abandon, Prior to starting plugging operations, a bradenhead test shall be performed if there has not been a reported bradenhead test within the 60 days immediately preceding the start of plugging operations. 1) If, before opening the bradenhead valve, the beginning pressure is greater than 25 psi, sampling is required. 2) If pressure remains at the conclusion of the test, or if any liquids were present during the test, sampling is required. The Form 17 shall be submitted within 10 days of the test. Sampling shall comply with Operator Guidance - Bradenhead Testing and Reporting Instructions. If samples are collected, copies of all final laboratory analytical results shall be provided to the COGCC within three (3) months of collecting the samples. If there is a need for sampling, contact COGCC engineering for verification of plugging procedure.

Operator failed to submit a Form 17 Bradenhead test prior to plugging.

Required Corrective Action: Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the ECMC Representative indicated below, detailing an internal procedure for timely compliance with Rule 420. Operator shall reference this Warning Letter document number in the subject of the email.

Corrective Action Deadline Date: 07/30/2025

### 434.a Plugging

Violation Date: 06/26/2025

Violation Discovery Date: 06/26/2025

Description of Alleged Violation: 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 timeliness of Plugging operations.

Persuant to Rule 434.a.(5)., All abandoned Wells will have a plug or seal placed in the casing and all open annuli from a depth of 50 feet to the surface of the ground or the bottom of the cellar in the hole in such manner as not to interfere with soil cultivation or other surface use. For below-grade markers, the



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Operator will fit the top of the casing with a screw cap or a steel plate welded in place with a weep hole. For abovegrade markers, the Operator will fit the top of the casing with a screw cap or a steel plate welded in place with a weep hole, and a permanent monument that will be a pipe not less than four inches in diameter and not less than 10 feet in length, of which four feet will be above ground level and the remainder embedded in cement or welded to the surface casing. Whether a below-grade or an above-grade marker is used, the Operator will inscribe the marker with the Well's legal location, Well name and number, and API Number. The Operator will not cap or seal the Well until 5 days after placing the last plug to allow monitoring for successful plugging and will cap or seal the Well within 90 days after placing the last plug.

Operator did not wait 5 days after placing the last plug to allow monitoring for successful plugging before Cut and Cap.

**Required Corrective Action:** Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the ECMC Representative indicated below, detailing an internal procedure for timely compliance with Rule 434.a.(5).. Operator shall reference this Warning Letter document number in the subject of the email.

**Corrective Action Deadline Date:** 07/30/2025

### 435 Form 6, Well Abandonment Reports

**Violation Date:** 06/26/2025

**Violation Discovery Date:** 06/26/2025

**Description of Alleged Violation:** 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 Form 6, Well Abandonment Reports, are outstanding for the Well.

Pursuant to Rule Pursuant to Rule 435.b., Operator is required to file a Form 6—Subsequent Report of Abandonment (Form 6-S”) within 30 days of abandonment.

If the Well has been plugged or abandoned, and Operator did not have valid ECMC approval of a Form 6-S within 30 days after the abandonment (or re-plugging), Operator violated Rule 435.

Operator did not submit a Form 6-S within 30 days after the abandonment.

**Required Corrective Action:** Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the ECMC Representative indicated below, confirming that all required Form 6s are submitted, accurate, and up-to-date; and detailing an internal procedure for timely compliance with Rule 435. in the future. Operator shall reference this Warning Letter document number in the subject of the email.

Operator shall also work with ECMC Engineering staff to ensure the Form 6s for the Well(s) contain the appropriate information, in the appropriate format, as deemed necessary by ECMC Engineering staff to approve the Form 6s.

**Corrective Action Deadline Date:** 07/30/2025



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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: Greager, Meredith

Title: Engineering QA Specialist

Phone Num: (720) 830-4175x

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](http://www.colorado.gov/ecmc).

Sincerely,

Greager, Meredith  
Engineering QA Specialist

### **Attachments**

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

### **Document Number    Description**

| <b><u>Document Number</u></b> | <b><u>Description</u></b> |
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|                               |                           |

Total Attach: 0 Files