



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

OUTCOME NOTICE for WARNING LETTER # 404426355

11/10/2025

TEP ROCKY MOUNTAIN LLC (#96850)
JEFFREY D KIRTLAND
jeff.kirtland@flywheelenergy.com

1058 COUNTY ROAD 215
PARACHUTE, CO 81635

Re: Warning Letter # 404426355
Date Issued 11/10/2025

Kelton WGV 414-27-697 (API# 045-24586)
NESW, 27, 6S, 97W, GARFIELD

This Outcome Notice is to inform you of the status of the violation(s) alleged in the above referenced Warning Letter.

Alleged Violation(s) and Required Corrective Action(s):

434.a.(5) Plugging Requirements

Violation Date: 11/06/2025

Violation Discovery Date: 11/06/2025

Description of Alleged Violation: Pursuant to Rule 434.a.(5) 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.

On Operator's Form 6, Subsequent Report of Abandonment ("Form 6SRA"), Operator indicated they did not wait 5 days to cap or seal the Well after placing the last plug to allow monitoring for successful plugging and/or capped or sealed the Well after the 90 day period following the placement of the last plug.

Required Corrective Action: Operator will submit a response to this Warning Letter providing an explanation for not complying with the required timeline between placing the surface plug and capping the well. The explanation must detail how complete and effective isolation was achieved and confirmed.

Operator will submit a Standard Operating Procedure ("SOP") and plan for how they will comply with Rule 434.a.(5) in the future, and submit their verification for how they complied with the COAs in their Form 6SRA: "After surface plug and prior to cap, verify isolation by either a 15 minute bubble test or 15 minute optical gas imaging. If there is indication of flow contact ECMC Engineering. Provide a statement on the Form 6SRA which method was used and what was observed. Retain records of the final isolation test for 5 years."

Corrective Action Deadline Date: 11/24/2025

Corrective Action Performed by Operator

Description: Operator submitted a response explaining the cut and cap dates on two of the Form



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6Ss were inaccurate, explaining a misunderstanding of the 5 day limit for the third well, and detailing how they will ensure compliance going forward.

Completion Date: 11/24/2025

Outcome of Warning Letter # 404426355: No Further Action Required

Operator submitted a response explaining the cut and cap dates on two of the Form 6Ss were inaccurate, explaining a misunderstanding of the 5 day limit for the third well, and detailing how they will ensure compliance going forward.

Other Violations:

If ECMC has reasonable cause to believe that TEP ROCKY MOUNTAIN LLC has additional violations not addressed through the above referenced Warning Letter, the ECMC may issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 523, ECMC Rules of Practice and Procedure, 2 CCR 404-1. ECMC may or may not elect to issue Warning Letters for additional instances of non-compliance based on the guidance of the ECMC Enforcement Guidance and Penalty Policy (Corrected 4/8/2015) and ECMC Rules.

Sincerely,

Greager, Meredith
Engineering QA Specialist
(720) 830-4175x
meredith.greager@state.co.us

Attachments

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

Document Number Description

404429578	WARNING LETTER DOCUMENTATION
404429588	WARNING LETTER ISSUED
404455528	WARNING LETTER RESPONSE DOCUMENTATION

Total Attach: 3 Files