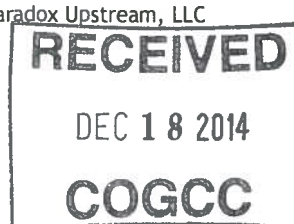




Castleton Commodities International Paradox Upstream, LLC
600 17th Street, Suite 1900S
Denver, CO 80202

303-728-2222
720-728-2215



December 16, 2014

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ref. No. 1ZX05Y020295694807 - UPS

Colorado Oil & Gas Commission
Department of Natural Resources
Attn: Arthur Keopsell, P.G.
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: Warning Letter – Summit Point Federal #1 COGCC Rule 609 Ground Water Sampling

Dear Arthur Keopsell,

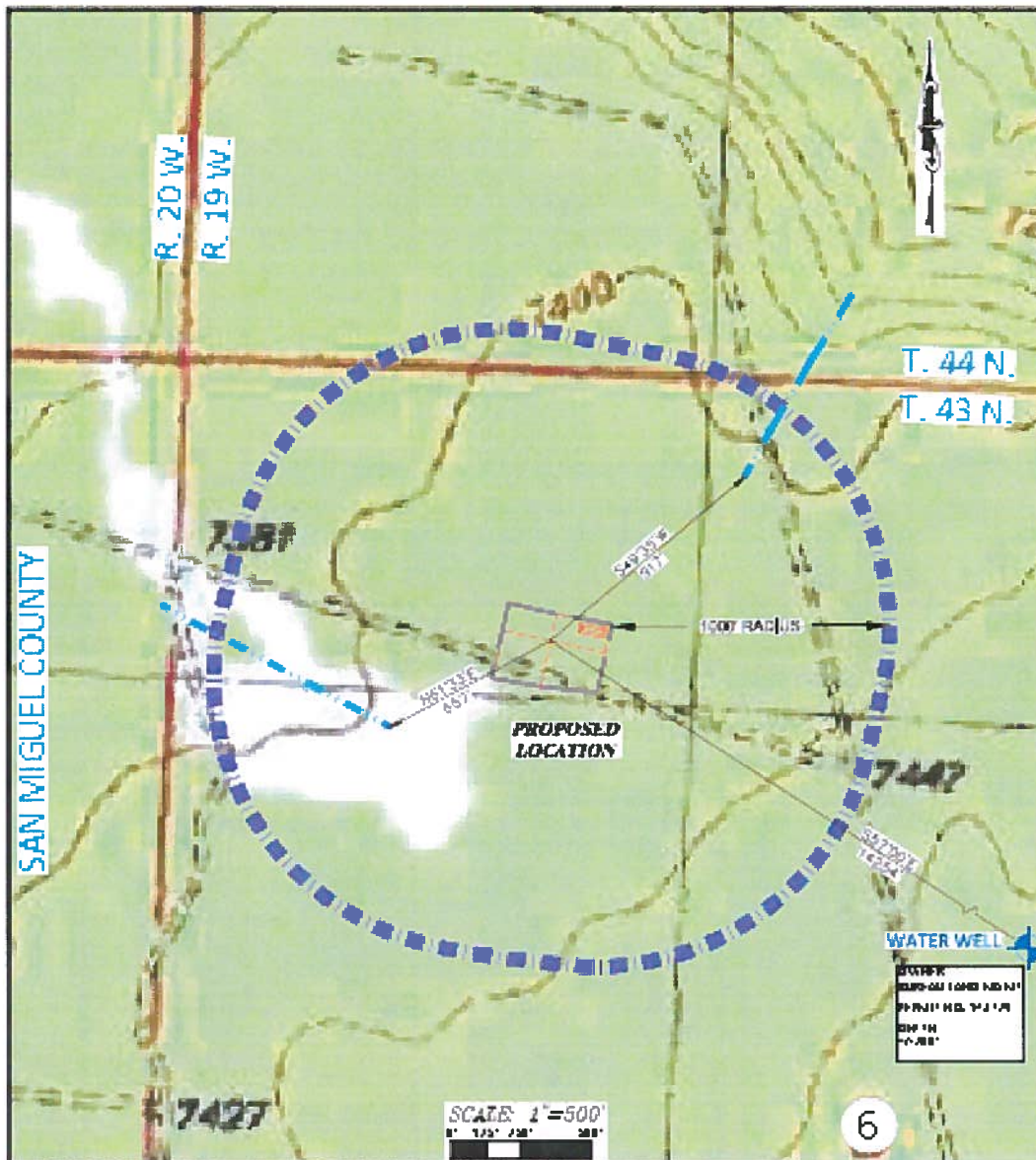
In response to the December 12, 2014 Warning Letter for the Summit Point Federal #1 location regarding the groundwater sampling requirement pursuant to Groundwater Sampling per Statewide Rule 609.c. In compliance with the Warning Letter, CCI completed the corrective action by submitting a Sundry Notice, Form 4, on December 12, 2014 to request exception to Rule 609. The basis for an exception request is that the nearest water well to the Summit Point Federal 1 well is approximately 2.7 miles away, as illustrated on the attached exhibit (see Attachment A). COGCC approved the exception request on December 16, 2016 (see Attachment B). CCI has fully complied with the requirements of the Warning Letter by the prescribed deadline of December 31, 2014.

If you have any questions about this update or require further information, please contact Chrissy Schaffner at 303-728-2217 or chrissy.schaffner@cci.com.

Sincerely,

Chrissy Schaffner
Regulatory Affairs
CCI Paradox Upstream LLC
chrissy.schaffner@cci.com
O: (303)728-2217

ATTACHMENT A



DISCLAIMER

The information contained in this map is for informational purposes only and should not be used for any other purpose. The user assumes all liability for any use of this information.

SUMMIT COUNTY
HYDROLOGY



WILLIAM H. SMITH & ASSOCIATES P.C.
SURVEYING CONSULTANTS
550 EAST SECOND NORTH
GREEN RIVER, WY
PHONE: 307-675-0608
307-675-0609
www.williamhsmith.com

PROJECT: 2011080001
REVISED:

DATE: 08/08/11
SCALE: 1" = 500'
SHEET:

PAGE 1 OF 1

HYDROLOGY MAP

PATARA OIL & GAS, LLC
HYDROLOGY WITHIN 1000' RADIUS

NE 1/4 SECTION 10
T. 43 N., R. 19 W., N.M.P.M.
SAN MIGUEL COUNTY, COLORADO

ATTACHMENT B

FORM
4
Rev
04/19

State of Colorado
Oil and Gas Conservation Commission
100 Lincoln Street, Suite 201, Denver, Colorado 80202
Phone: (303) 239-3100 Fax: (303) 239-3102



DE	ST	OF	FS
Document Number: 400753023			
Date Received: 12/16/2014			

SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number, identify Oil and Gas Location by Location ID Number, identify other Facility by Facility ID Number.

OGCC Operator Number: **0453** Contact Name: **Christy Schaffer**
Name of Operator: **CCIPARADIGM UPSTREAM LLC** Phone: **(303) 725-2211**
Address: **600 17TH STREET #500B** Fax: **(303) 725-2215**
City: **DENVER** State: **CO** Zip: **80202** Email: **christy.schaffer@cd.com**

Complete the Attachment
Checklist

OP OGCC

API Number: **DE-113-05272-00** OGCC Facility ID Number: **437453**
Well/Facility Name: **Summit Point Federal** Well/Facility Number: **1**
Location Qtr/Qr: **NENW** Section: **6** Township: **43N** Range: **19W** Meridian: **N**
County: **SAN MIGUEL** Field Name: **WILDCAT**
Federal, Indian or State Lease Number: **COO-085518**

Survey Plat		
Decedent Survey		
Site Egoat Diagram		
Technical Info Page		
Other		

GROUND WATER SAMPLING

Uses of Ground Water Sampling Section

Request an Exception to Ground Water Sampling Requirements in Greater Wellington Area Rule 318A(4) or in Statewide Rule 60B(3). Request a Previously Sampled Water Source in the COGB database be used to meet sampling requirements as described in Rule 60B(3).

NOTE: This Sundry Notice labeling submitted to request a Ground Water Sampling Exception cannot be used for any other purpose except requesting the use of a Previously Sampled Water Source in the COGB database.

- ☐ Request an Exception to Ground Water Sampling Requirements per Greater Wellington Area Rule 318A(4): There are no Available Water Sources located within the governmental quarter section or within a previously unsampled governmental quarter section within a 1/2 mile radius of this proposed Oil and Gas Well, Multi-Well Site, or Dedicated Injection Well.
- ☒ Request an Exception to Ground Water Sampling Requirements per Statewide Rule 60B(3).
- ☐ Number of Water Sources located within one-half (1/2) mile of a proposed Oil and Gas Well, Multi-Well Site, or Dedicated Injection Well.
- ☐ Number of Water Source Exceptions requested per Rule 60B(3).
- ☐ Number of Water Sources determined to be unsuitable. The condition of these Water Sources MUST be documented in the comments below or in an attachment.
- ☐ Number of Water Sources suitable for testing whose owners refused to grant access despite an operator's reasonable good faith efforts to obtain consent to conduct sampling. The reasonable good faith efforts used to obtain access from the owner of these Water Sources MUST be documented in the comments below or in an attachment.
- ☐ Request a Previously Sampled Water Source in the COGB database be used to meet sampling requirements as described in Rule 60B(3).

Type of Sample Submission Request

Enter Sample ID Number from COGB Maps for each Previous Water Sample:

Sample ID	Facility ID	Sample Date	Sample Purpose

COMMENT B

Please accept COI Paradox Upstream, LLC request for an Exception to the Groundwater Sampling Requirement per Statewide Rule 60B.cas the nearest water well to the Summit Point Federal #1 well is 2.7 miles away. Please see the attached exhibit I.

Operator Comments:

Please accept COI Paradox Upstream, LLC request for an Exception to the Groundwater Sampling Requirement per Statewide Rule 60B.cas the nearest water well to the Summit Point Federal #1 well is 2.7 miles away. Please see the attached exhibit I showing this.

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed:

Print Name: Ashley Noonan

Title: Regulatory Analyst

Email: ashley.noonan@contractor.od.com

Date: 12/16/2014

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: ROBERTS, ARTHUR

Date: 12/16/2014

CONDITIONS OF APPROVAL, IF ANY:

COA Type

Description

General Comments

User Group	Comment	Comment Date
Environmental	Operator filed the Sundry after the COGCC sent a Warning Letter (Document # 2533855) to the operator.	12/16/2014 1:02:20 PM
Environmental	The operator agreed to changing the request from a 318a.B(4) to a 60B exception request via email. The email is included in the attachment under correspondence.	12/16/2014 12:35:29 PM
Environmental	A review of DVR data on the COGCC website indicates that there are no water features that meet the 100 series definition of a water source within 1/4 mile of the oil and gas well(s).	12/16/2014 12:17:53 PM

Total: 3 comment(s)

Attachment Check List

Att. Doc. Num.	Name
2533855	CORRESPONDENCE
400753023	FORM 4 SUBMITTED
400753029	OTHER

Total Attach: 3 Files