

From: [Diana Burn - DNR](#)
To: [Diana Burn - DNR](#); "[HODGE CHRISTINE](#)"; "[Kelly Lyman](#)"
Subject: WARNING LETTER :RESPONSE REQUIRED Saga Petroleum Government C-1035#1 103-07768
Date: Friday, April 17, 2015 9:19:00 AM
Attachments: [image001.png](#)

Subject: Warning Letter Rule 311

You are receiving this notification because you are listed as the principal agent for the operator.

Our records show that as an operator of record for (an) existing well(s) in Colorado you have not submitted a Form 6, Subsequent Report of Abandonment. Your company is out of compliance with this reporting requirement. Please submit the Form 6, Subsequent Report of Abandonment) by April 24, 2015. This information has previously been requested.

This Warning Letter is to inform you that the oil and gas facility or the oil and gas operations listed above may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission ("COGCC") and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator's compliance with this Warning Letter is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by **April 24, 2015** (Form 6, Subsequent Report of Abandonment). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

The COGCC requires the operator of record to implement corrective action(s) for the conditions identified. The attached list of wells appears to be out of compliance with COGCC Rule 311.

Government C-1035#1 103-07768

Failure to Comply with Warning Letter:

For a failure to perform required corrective actions, COGCC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)

If you have any questions about this Warning Letter, please contact me.

Thanks,

Diana

Diana Burn, P.E.
Eastern Engineering Supervisor



P [303.894.2100](tel:303.894.2100) x5106 | F [303.894.2109](tel:303.894.2109) | C [303.918.6320](tel:303.918.6320)
1120 Lincoln Street, Suite 801, Denver, CO 80203
Diana.Burn@state.co.us | www.colorado.gov/cogcc

From: Diana Burn - DNR [mailto:diana.burn@state.co.us]
Sent: Tuesday, March 31, 2015 8:48 AM
To: 'HODGE CHRISTINE'
Subject: FW: Saga Petroleum Government C-1035#1 103-07768

From: Diana Burn - DNR [mailto:diana.burn@state.co.us]
Sent: Tuesday, March 31, 2015 8:22 AM
To: 'Jaimie Reis '
Subject: FW: Saga Petroleum Government C-1035#1 103-07768

Hi Jaimie - It does not appear that we ever got the Form 6, Subsequent Report of Abandonment – this well is on the list as needing an MIT since we do not have the SROA. Please submit the SROA and the required contractor's job summaries and cement tickets by April 15th, 2015 so this well can become compliant and accurately reflect the well's status.

Thanks,
Diana

Diana Burn, P.E.
Eastern Engineering Supervisor



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From: Jaimie Reis [mailto:jreis@sagapetroleum.com]
Sent: Tuesday, May 13, 2014 8:55 AM
To: Bob Koehler - DNR
Subject: RE: Saga Petroleum Government C-1035#1

Thank you Bob. I will begin working on this right away. I appreciate your help!

Best

Jaimie Reis
Environmental Specialist
Saga Petroleum
Ph: 303.996.7766 Ext 304
Fax:303.996.7767



From: Bob Koehler - DNR [<mailto:bob.koehler@state.co.us>]
Sent: Monday, May 12, 2014 6:35 PM
To: Jaimie Reis
Subject: RE: Saga Petroleum Government C-1035#1

Hi Jaimie,

Sorry but COGCC can't use a BLM Sundry to Abandon a well. That's why the well still shows on our records.

Please submit a Form 6 Subsequent Report of Abandonment copies of the appropriate wireline and cement tickets. You will have to translate the procedure on the BLM Sundry into that of our Form 6. Please make sure to make a comment that you submitted the BLM Sundry (refer to Document # 2110945-we do have it, it just isn't what we needed). Also state that the BLM "Accepted" your filing (I don't believe they "Approve" the form the way we do.)

If anyone here asks a question feel free to use my name as a reference.

Cheers,

Robert P. (Bob) Koehler, PhD
Underground Injection Control Lead, Geology Advisor



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From: Jaimie Reis [<mailto:jreis@sagapetroleum.com>]
Sent: Monday, May 12, 2014 10:33 AM
To: [Bob.Koehler@state.co.us](mailto:bob.koehler@state.co.us)
Subject: Saga Petroleum Government C-1035#1

Good Morning Mr. Koehler

It has come to my attention that the COGCC's well status for the Government C-1035#1 API number 05-103-07768-00-X1 does not match our current records. In January of 2011 we submitted a sundry for Plug and Abandon that was accepted and the COGCC was notified of this; however, the

COGCC shows that this well is currently producing. I have attached a letter from yourself dated August of 2013 for non-compliance regarding this matter as well as a copy of the accepted sundry. From here, what does Saga need to submit to the COGCC so that the status of the well is PA?

Thank you for help regarding this matter. Please feel free to respond via email or phone.

Jaimie Reis

Environmental Specialist

Saga Petroleum

Ph: 303.996.7766 Ext 304

Fax:303.996.7767

