



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

September 2, 2015

Billy Hataway, Field Operations Director
Black Raven Energy Inc - Operator Number 10203
165 S. Union Blvd, Suite 410
Lakewood, CO. 80228

RE: Form 21 Mechanical Integrity Tests for wells listed below,

Adena J Sand Unit W-39	API #087-05148
Adena J Sand Unit W-3	API #087-60012
Adena J Sand Unit 6-71	API #087-08112

This Warning Letter is to inform you of potential violations to rules and regulations of the Colorado Oil and Gas Conservation Commission (COGCC) for the above-referenced MITs for reasons listed below.

- Failure by the operator to provide 10-day advance notice of intent to perform a Mechanical Integrity Test via Form 42, Field Operations Notice.

Advance Notice Requirements for SI Wells. Rules 316B and 326.e require operators to provide advance notice to the COGCC no fewer than ten (10) days prior to the intended date of performing an MIT. In addition to providing notice to the COGCC inspector for purposes of witnessing the test, the advance-notice Form 42 is required in order to enter the MIT record into the COGCC database. Furthermore, as part of the Form 21 review, COGCC staff confirm that no fewer than ten (10) days of advance notice were provided via the associated Form 42.

Violations of this requirement of Rule 316B are listed in the COGCC Enforcement Guidance and Penalty Policy (on page 3 of Appendix A) as discretionary penalties tracked by operator. Repeated violations by a single operator may be grounds for penalty enforcement action.

In your email this afternoon, you mentioned that your current method of communication for MITs is to notify the COGCC inspector directly over the phone in order to arrange a time for a witnessed test. This letter is intended as a warning to outline the requirement for ten (10) day advance in hopes of ensuring future compliance to Rules 316B and 326.e. Note that future failures to provide adequate notice for MITs via Form 42 may result in penalty enforcement.

Sincerely,

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