

**FORM  
INSP**Rev  
05/11**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

04/08/2016

Document Number:

685300307

Overall Inspection:

**ACTION REQUIRED****FIELD INSPECTION FORM**

|                     |             |        |                        |                          |             |
|---------------------|-------------|--------|------------------------|--------------------------|-------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name:        | On-Site Inspection       | 2A Doc Num: |
|                     | 267053      | 306801 | St John, William (Cal) | <input type="checkbox"/> |             |

**Operator Information:**OGCC Operator Number: 26625Name of Operator: ELM RIDGE EXPLORATION COMPANY LLCAddress: 12225 GREENVILLE AVE STE 950City: DALLAS State: TX Zip: 75243-

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☒ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

**Contact Information:**

| Contact Name     | Phone                   | Email                       | Comment               |
|------------------|-------------------------|-----------------------------|-----------------------|
| Lindeman, Terry  | 505-632-8048<br>EXT 210 | tlindeman@elmridge.net      | SW Inspection Reports |
| Labowskie, Steve |                         | steve.labowskie@state.co.us | COGCC                 |
| Archuleta, Amy   |                         | aarchuleta@elmridge.net     | SW Inspection Reports |

**Compliance Summary:**QtrQtr: NWNE Sec: 8 Twp: 33N Range: 8W

| Insp. Date | Doc Num   | Insp. Type | Insp Status | Satisfactory /Action Required | PA P/F/I | Pas/Fail (P/F) | Violation (Y/N) |
|------------|-----------|------------|-------------|-------------------------------|----------|----------------|-----------------|
| 06/21/2010 | 200256319 | PR         | PR          | SATISFACTORY                  |          |                | No              |

**Inspector Comment:**

This report contains corrective actions and comments. See Spills, Equipment, Facilities, and COA(2A)/Predrill, sections of report. See link at end of report for path to downloadable pictures.

**Related Facilities:**

| Facility ID | Type | Status | Status Date | Well Class | API Num   | Facility Name | Insp Status |                                     |
|-------------|------|--------|-------------|------------|-----------|---------------|-------------|-------------------------------------|
| 267053      | WELL | PR     | 10/13/2006  | GW         | 067-08793 | OLSON 1A      | PR          | <input checked="" type="checkbox"/> |
| 275628      | WELL | PR     | 08/25/2014  | GW         | 067-09006 | IGE 103       | PR          | <input checked="" type="checkbox"/> |

**Equipment:****Location Inventory**

|                                |                        |                      |                         |
|--------------------------------|------------------------|----------------------|-------------------------|
| Special Purpose Pits: _____    | Drilling Pits: _____   | Wells: <u>2</u>      | Production Pits: _____  |
| Condensate Tanks: _____        | Water Tanks: <u>2</u>  | Separators: <u>2</u> | Electric Motors: _____  |
| Gas or Diesel Motors: <u>1</u> | Cavity Pumps: _____    | LACT Unit: _____     | Pump Jacks: <u>1</u>    |
| Electric Generators: _____     | Gas Pipeline: _____    | Oil Pipeline: _____  | Water Pipeline: _____   |
| Gas Compressors: _____         | VOC Combustor: _____   | Oil Tanks: _____     | Dehydrator Units: _____ |
| Multi-Well Pits: _____         | Pigging Station: _____ | Flare: _____         | Fuel Tanks: _____       |

**Location**

|  |   |   |   |                 |
|--|---|---|---|-----------------|
| <b>Lease Road:</b>                                     |   |   |   |                 |
| Type   | Satisfactory/Action Required  | comment                                       | Corrective Action   | Date            |
| Access   | SATISFACTORY  |   |   |                 |
| <b>Signs/Marker:</b>                                   |   |   |   |                 |
| Type   | Satisfactory/Action Required  | Comment                                       | Corrective Action   | CA Date         |
| TANK LABELS/PLACARDS                                   | SATISFACTORY  |   |   |                 |
| WELLHEAD   | SATISFACTORY  |   |   |                 |
| Emergency Contact Number (S/AR): SATISFACTORY          |   |   | Corrective Date:  |                 |
| Comment:   |   |   |   |                 |
| Corrective Action:                                     |   |   |   |                 |
| <b>Good Housekeeping:</b>                              |   |   |   |                 |
| Type   | Satisfactory/Action Required  | Comment                                       | Corrective Action   | CA Date         |
|  |   |   |   |                 |
| <b>Spills:</b>   |   |   |   |                 |
| Type   | Area  | Volume  | Corrective action   | CA Date         |
| Produced Water   | Separator   | <= 1 bbl                                      | Separator blow down line appears to of been leaking for some time. Control and contain release and clean up per Rule 906.a. | 05/13/2016      |
| <input type="checkbox"/> Multiple Spills and Releases? |   |   |   |                 |
| <b>Fencing/:</b>                                       |   |   |   |                 |
| Type   | Satisfactory/Action Required  | Comment                                       | Corrective Action   | CA Date         |
|  |   |   |   |                 |
| <b>Equipment:</b>                                      |   |   |   |                 |
| Type: Deadman # & Marked                               | # 5   | Satisfactory/Action Required: SATISFACTORY    |   |                 |
| Comment  |   |   |   |                 |
| Corrective Action                                      |   |   |   | Date:           |
| Type: Bird Protectors                                  | # 2   | Satisfactory/Action Required: SATISFACTORY    |   |                 |
| Comment  |   |   |   |                 |
| Corrective Action                                      |   |   |   | Date:           |
| Type: Vertical Heated Separator                        | # 2   | Satisfactory/Action Required: ACTION REQUIRED |   |                 |
| Comment  | Separator is leaking fluid from blow down line. From crusting of minerals on the pipe (inside and outside)of separator and the ground this appears to be accumulating for sometime. |   |   |                 |
| Corrective Action                                      | Repair, replace, and securely fasten all valves, pipes, and fittings to ensure good mechanical condition per Rule 605.d   |   |   | Date: 5/13/2016 |
| Type: Ancillary equipment                              | # 2   | Satisfactory/Action Required: SATISFACTORY    |   |                 |
| Comment  | Wellheads   |   |   |                 |
| Corrective Action                                      |   |   |   | Date:           |
| Type: Other  | # 1   | Satisfactory/Action Required: SATISFACTORY    |   |                 |

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|                     |     |                               |              |
|---------------------|-----|-------------------------------|--------------|
| Comment             |     | Riser                         |              |
| Corrective Action   |     | Date:                         |              |
| Type: Gas Meter Run | # 2 | Satisfactory/Action Required: | SATISFACTORY |
| Comment             |     |                               |              |
| Corrective Action   |     | Date:                         |              |
| Type: Plunger Lift  | # 1 | Satisfactory/Action Required: | SATISFACTORY |
| Comment             |     |                               |              |
| Corrective Action   |     | Date:                         |              |
| Type: Flow Line     | # 2 | Satisfactory/Action Required: | SATISFACTORY |
| Comment             |     |                               |              |
| Corrective Action   |     | Date:                         |              |

|                        |  |                                   |                     |                 |            |
|------------------------|--|-----------------------------------|---------------------|-----------------|------------|
| <b>Facilities:</b>     |  | <input type="checkbox"/> New Tank |                     | Tank ID: _____  |            |
| Contents               | #  | Capacity                          | Type                | SE GPS          |            |
| PRODUCED WATER         | 1  | 500 BBLS                          | HEATED STEEL AST    |                 |            |
| S/AR                   | SATISFACTORY   |                                   | Comment:            |                 |            |
| Corrective Action:     |  |                                   | Corrective Date:    |                 |            |
| <u>Paint</u>           |  |                                   |                     |                 |            |
| Condition              | Adequate   |                                   |                     |                 |            |
| Other (Content) _____  |  |                                   |                     |                 |            |
| Other (Capacity) _____ |  |                                   |                     |                 |            |
| Other (Type) _____     |  |                                   |                     |                 |            |
| <u>Berms</u>           |  |                                   |                     |                 |            |
| Type                   | Capacity   | Permeability (Wall)               | Permeability (Base) | Maintenance     |            |
| Metal                  | Adequate   | Walls Sufficient                  | Base Insufficient   | Inadequate      |            |
| Corrective Action      | Location is within a designated setback location, repair liner or install berms or other secondary containment devices per Rule 604.c.(2).G. |                                   |                     | Corrective Date | 04/29/2016 |
| Comment                | Tank liner has holes and tears compromising liner integrity.   |                                   |                     |                 |            |

|                 |    |
|-----------------|----|
| <b>Venting:</b> |    |
| Yes/No          | NO |
| Comment         |    |

|                    |                              |
|--------------------|------------------------------|
| <b>Flaring:</b>    |                              |
| Type               | Satisfactory/Action Required |
| Comment:           |                              |
| Corrective Action: | Correct Action Date:         |

|                          |                                   |
|--------------------------|-----------------------------------|
| <b>Predrill</b>          |                                   |
| Location ID: 267053      |                                   |
| <b>Site Preparation:</b> |                                   |
| Lease Road Adeq.: _____  | Pads: _____ Soil Stockpile: _____ |
| <b>S/AR:</b> _____       |                                   |
| Corrective Action: _____ | Date: _____ CDP Num.: _____       |

**Form 2A COAs:**

| Group | User     | Comment   | Date       |
|-------|----------|---|------------|
| OGLA  | kubeczkd | <p>Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.</p> <p>Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.</p> <p>The access road will be maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.</p> <p>Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.</p> <p>Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.</p> | 01/06/2014 |
| OGLA  | kubeczkd | Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Southwest Colorado (Steve Labowskie; email steve.labowskie@state.co.us) 48 hours prior to testing surface poly/steel or buried poly/steel pipelines.   | 01/06/2014 |
| OGLA  | kubeczkd | <p>The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.</p> <p>Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.</p>   | 01/06/2014 |
| OGLA  | kubeczkd | Notify the COGCC 48 hours prior to start of pad reconstruction/regrading (if necessary), rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).  | 01/06/2014 |

**S/AR:** ACTION REQUIRED**Comment:**

Tank battery liner has holes and tears in liner that ruin the integrity of liner to be impervious and contain any spilled or released material around crude oil, condensate, and produced water tanks..

**CA:** Repair or replace liner to comply with Form 2A COA's OGLA.**Date:** 05/13/2016**Wildlife BMPs:**

| BMP Type                               | Comment   |
|--|---|
| Pre-Construction                       | Rule 604.c.(2)W-Pre-construction consultation occurred at the time the Surface Damage Agreement was negotiated. In subsequent conversations with the surface owner, Willard Semler, no changes were requested and none are anticipated.   |
| Drilling/Completion Operations         | <p>Rule 604.c.(2)B.- A closed loop system will be used. No fresh water pits are planned. Fresh water will be stored in above ground tanks</p> <p>Per Rule 604.c.(2)C.)-i.- There are producing wells within one mile of the location of the proposed IGE 103 well. It is anticipated that this will be a producing well and, if so, Elm Ridge will comply with applicable requirements under Rule 805.</p> <p>ii- No uncontrolled venting is anticipated (based on 500 mcf)</p> <p>iii-aa., bb. cc.- Elm Ridge will use a system capable of handling 1.5 Mmcf. Anticipated flowback is 0.5 Mmcf or less. No necessity for flaring is anticipated.</p> <p>Rule 604.c.(2)H.- Elm Ridge will be using a 3M system per BLM specifications.</p> <p>Rule 604.c.(2)I.- BOPE pressure testing will be performed weekly.</p> <p>604.c.(2)K.- Pit level indicators will be used.</p> <p>604.c.(2)L- Drill stem tests are not typically done and none are anticipated.</p> <p>Rule 604.c.(2)O- Load lines will be bullplugged</p> <p>Rule 604.c.(2)Q- Guy line anchors will be identified per COGCC rules and are tested before each use.</p> <p>Rule 604.c.(2)S. – Existing well access road will be used and maintained for all weather use and will meet any safety requirements.</p> |
| General Housekeeping                   | Rule 604.c.(2)P- Trash containers will be maintained on site. Trash will be hauled to and disposed at a commercial landfill.  |
| Noise mitigation                       | <p>(Rule 604.c.(2)A</p> <p>Noise levels will be monitored by operator and if exceeds acceptable levels operator agrees to install sound walls or, if necessary, provide reasonable motel accommodations for the affected party.</p> <p>Post-production:</p> <p>No necessity for engines or motorized equipment is anticipated.</p> <p>If such equipment becomes necessary, Elm Ridge will first try to electrify the location if it is practical and feasible. If not, they will orient exhaust away from the affected party and will use hospital grade mufflers, buried, in series.</p> <p>Elm Ridge will install sound walls if necessary</p>  |
| Traffic control                        | Rule 604.c.(2)D- Access is off County Road 309A, approximately 1.9 miles North of it's intersection with County Road 318. Access gate is on the East side of the County Road. Access is granted by existing Road Use agreement and in Surface Damage Agreement (both attached). Elm Ridge agrees to comply with any La Plata County traffic control measures required for this well.  |
| Material Handling and Spill Prevention | <p>Rule 604.c.(2)F- Wells are monitored daily by the pumpers. Pressure monitoring is not necessary. Maximum reservoir pressure is approximately 1200 psig. These are low pressure gathering lines. All gathering lines are checked yearly for leaks.</p> <p>Per Rule 604.c.(2)G.- Berms will be constructed with corrugated metal sides and will be sufficient in height and area to contain 150% of the volume of the largest single tank. Synthetic liners are being and will be used under tanks on location.</p> <p>Rule 604.c.(2)N-Any materials not in use that might constitute a fire hazard will be removed a minimum distance of twenty five feet from the wellhead, tanks and separator. No electrical equipment installations are planned inside the bermed area.</p>   |
| Storm Water/Erosion Control            | Wattles will be placed, where necessary, around the perimeter of the site prior to, or at the beginning of construction. The size and quantity of the wattles used will vary according to the location to insure adequate protection of drainage areas.   |

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|                                     |  |
|-------------------------------------|--|
| Construction                        | Rule 604.c.(2)V.- the IGE 103 well will be located in the immediate vicinity of and partially within the footprint of the existing Olson #1A well pad.<br>Rule 604.c.(2)B.- no fresh water pits are planned.<br>Rule 604.c.(2)E- The existing well access road will be used. No new disturbance is anticipated. Standard specifications for this access road include a driving surface constructed with with 6 inches of 3" minus gravel over a driving surface approximately 12 feet in width, crowned, with ditches and culverts where necessary for drainage.<br>Rule 604.c.(2)M.- The tract of land where the well pad is located is perimeter fenced with an entrance to well access on CR 309A.<br>Rule 604.c.(2)V-The existing well pad for the Elm Ridge Olson #1A well is being used for this location. |
| Community Outreach and Notification | This well does not lie within a buffer zone, exception zone or urban mitigation area.  |

**S/AR:** ACTION REQUIRED **Comment:** Material Handling and Spill Prevention - Wells monitored daily, self inspection should identify leaking separator and holes and tears in liner.

**CA:** Monitor location daily to comply with Rule 604.c.(2).F. Repair and install or replace liner to comply with Rule 604.c.(2).G **Date:** 05/13/2016

**Comment:**

**Staking:**

**On Site Inspection (305):**

Surface Owner Contact Information:

Name:  Address:

Phone Number:  Cell Phone:

Operator Rep. Contact Information:

Landman Name:  Phone Number:

Date Onsite Request Received:  Date of Rule 306 Consultation:

Request LGD Attendance:

LGD Contact Information:

Name:  Phone Number:  Agreed to Attend:

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

### Facility

Facility ID: 267053 Type: WELL API Number: 067-08793 Status: PR Insp. Status: PR

### Producing Well

Comment: PR

Facility ID: 275628 Type: WELL API Number: 067-09006 Status: PR Insp. Status: PR

### Producing Well

Comment:

### Environmental

Spills/Releases:

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|                                   |                    |                               |
|-----------------------------------|--------------------|-------------------------------|
| Type of Spill: _____              | Description: _____ | Estimated Spill Volume: _____ |
| Comment: _____                    |                    |                               |
| Corrective Action: _____          |                    | Date: _____                   |
| Reportable: _____                 | GPS: Lat _____     | Long _____                    |
| Proximity to Surface Water: _____ |                    | Depth to Ground Water: _____  |

|                        |                   |             |            |
|------------------------|-------------------|-------------|------------|
| <b>Water Well:</b>     |                   | Lat _____   | Long _____ |
| DWR Receipt Num: _____ | Owner Name: _____ | GPS : _____ | _____      |

**Field Parameters:** \_\_\_\_\_

Sample Location: \_\_\_\_\_

|   |
|---|
| Emission Control Burner (ECB): _____                            |
| Comment: _____  |
| Pilot: _____ Wildlife Protection Devices (fired vessels): _____ |

**Reclamation - Storm Water - Pit**

|  |  |
|--|--|
| <b>Interim Reclamation:</b>  |  |
| Date Interim Reclamation Started: _____  | Date Interim Reclamation Completed: _____        |
| Land Use: RANGELAND  |  |
| Comment: _____   |  |
| 1003a. Waste and Debris removed? <u>Pass</u>   |  |
| CM _____   | CA _____ CA Date _____                           |
| Unused or unneeded equipment onsite? <u>Pass</u>   |  |
| CM _____   | CA _____ CA Date _____                           |
| Pit, cellars, rat holes and other bores closed? <u>Pass</u>  |  |
| CM _____   | CA _____ CA Date _____                           |
| Guy line anchors marked? <u>Pass</u>   |  |
| CM _____   | CA _____ CA Date _____                           |
| 1003b. Area no longer in use? <u>Pass</u> Production areas stabilized ? <u>Pass</u>  |  |
| 1003c. Compacted areas have been cross ripped? <u>Pass</u>   |  |
| 1003d. Drilling pit closed? <u>Pass</u> Subsidence over on drill pit? <u>Pass</u>  |  |
| Cuttings management: _____   |  |
| 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? <u>In</u> |  |
| Production areas have been stabilized? <u>Pass</u>   | Segregated soils have been replaced? <u>Pass</u> |
| RESTORATION AND REVEGETATION   |  |
| <u>Cropland</u>  |  |

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Top soil replaced \_\_\_\_\_

Recontoured \_\_\_\_\_

Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Pass

Recontoured Pass

80% Revegetation In

1003 f. Weeds Noxious weeds? P

Comment: \_\_\_\_\_

Overall Interim Reclamation In Process

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_

Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_

Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_

No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_

Contoured \_\_\_\_\_

Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_

Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_

Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_

Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date \_\_\_\_\_

Overall Final Reclamation \_\_\_\_\_

Well Release on Active Location ☐

Multi-Well Location ☐

**Storm Water:**

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Sediment Traps   | Pass            |                         |                       |               |                          |         |
| Gravel           | Pass            | Gravel                  | Pass                  |               |                          |         |
| Berms            | Pass            | Compaction              | Pass                  |               |                          |         |
| Rip Rap          | Pass            |                         |                       |               |                          |         |
| Waddles          | Pass            |                         |                       |               |                          |         |
| Compaction       | Pass            | Culverts                | Pass                  |               |                          |         |

S/A/V: SATISFACTOR Corrective Date: \_\_\_\_\_

Y

Comment: Culvert on lease road requires maintenance.

CA: \_\_\_\_\_

Pits: ☒ NO SURFACE INDICATION OF PIT

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/webblink/>) and search by document number:

| Document Num | Description      | URL   |
|--------------|------------------|---|
| 685300317    | Separator Leak 2 | <a href="http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830125">http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830125</a> |



|           |                  |   |
|-----------|------------------|---|
| 685300319 | Tank Liner 1     | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830126">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830126</a> |
| 685300320 | Separator Leak 1 | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830127">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830127</a> |
| 685300321 | Tank Liner 2     | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830128">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3830128</a> |