

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402771415

Date Received:
08/05/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 69760
Name of Operator: PETRON DEVELOPMENT COMPANY
Address: 1899 W LITTLETON BLVD
City: LITTLETON State: CO Zip: 80120
Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>JIM WALKER</u>	<u>303-794-5300</u>	<u>jim@petron.net</u>
<u>Arthur, Denise</u>		<u>denise.arthur@state.co.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 690201823
Inspection Date: 07/13/2021 FIR Submit Date: 07/20/2021 FIR Status: _____

Inspected Operator Information:

Company Name: PUCKETT-WARREN OIL CO Company Number: 72555
Address: 1899 W LITTLETON BLVD
City: LITTLETON State: CO Zip: 80120

LOCATION - Location ID: 410586

Location Name: JOHNSON-62S46W Number: 9SESE County: YUMA
Qtrqtr: SESE Sec: 9 Twp: 2S Range: 46W Meridian: 6
Latitude: 39.891631 Longitude: -102.523607

FACILITY - API Number: 05-125- -00 Facility ID: 252419

Facility Name: JOHNSON Number: 3
Qtrqtr: SESE Sec: 9 Twp: 2S Range: 46W Meridian: 6
Latitude: 39.891631 Longitude: -102.523607

CORRECTIVE ACTIONS:

1 ☒ CA# 153939

Corrective Action: Comply with 1004 Rules. Date: 10/18/2013

Response: CA COMPLETED Date of Completion: 08/05/2021

Operator Comment: This well was plugged in March 2004. There were no COAs associated with this project. This site failed a final reclamation inspection on July 18, 2013. It failed because the inspector thought the risers on location belonged to the operator. The operator advised the COGCC and the inspector that the risers in question and the right-of-way DID NOT belong to the operator. They belong to the gatherer.

At that time, the ONLY issue was the risers. The inspector noted that "LOCATION IS CLEAN, CONTOURED

AND ADEQUATELY COVERED WITH GRASS AND NATURAL VEGETATION.(Read Doc# 668601115)

COGCC did not reinspect until July 20, 2021 and failed the site again. This time COGCC failed the site for:

1. The risers – again.
2. Lack of vegetation.

Given that the vegetation was found to be adequate 8 years ago, we contend it is satisfactory now. Drought conditions can cause vegetation issues on any surface area including those that may have formerly been O&G locations.

In addition, please note the following:

- a. Petron was a contract operator. Petron's contract with any potential interest owner(s) including Puckett-Warren Oil has been terminated. Petron has no legal right to represent any potential interest owners in this expired lease.
- b. This lease has expired. No operator would have authority to reenter the location (a.k.a, trespassing).

No action will be taken by the former operator (Puckett-Warren Oil) and Petron requests this inspection be cleared and the final status reflect a passed final inspection.

COGCC Decision: **Not Approved**

COGCC Representative: PETRON DEVELOPMENT COMPANY IS THE OPERATOR OF RECORD OF THE WELL SITE AND REMAINS RESPONSIBLE TO COMPLETE THE CORRECTIVE ACTION BY THE DUE DATE.

OPERATOR COMMENT AND SUBMITTAL

Comment: This well was plugged in March 2004. There were no COAs associated with this project. This site failed a final reclamation inspection on July 18, 2013. It failed because the inspector thought the risers on location belonged to the operator. The operator advised the COGCC and the inspector that the risers in question and the right-of-way DID NOT belong to the operator. They belong to the gatherer.

At that time, the ONLY issue was the risers. The inspector noted that "LOCATION IS CLEAN, CONTOURED AND ADEQUATELY COVERED WITH GRASS AND NATURAL VEGETATION".(Read Doc# 668601115)

COGCC did not reinspect until July 20, 2021 and failed the site again. This time COGCC failed the site for:

1. The risers – again.
2. Lack of vegetation.

Given that the vegetation was found to be adequate 8 years ago, we contend it is satisfactory now. Drought conditions can cause vegetation issues on any surface area including those that may have formerly been O&G locations.

In addition, please note the following:

- a. Petron was a contract operator. Petron's contract with any potential interest owner(s) including Puckett-Warren Oil has been terminated. Petron has no legal right to represent any potential interest owners in this expired lease.
- b. This lease has expired. No operator would have authority to reenter the location (a.k.a, trespassing).

No action will be taken by the former operator (Puckett-Warren Oil) and Petron requests this inspection be cleared and the final status reflect a passed final inspection.

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

Print Name: Jimmy Walker

Signed: _____

Title: Sec./Treas.

Date: 8/5/2021 11:09:15 AM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
------------------------	--------------------

402771415	FIR RESOLUTION SUBMITTED
-----------	--------------------------

Total Attach: 1 Files