



Re: Rampart Energy Company / 5685

1 message

Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Tue, Sep 13, 2022 at 1:18 PM

To: Kim Mohr <kjm@rampartenergy.com>

Cc: "Denise.arthur@state.co.us" <Denise.arthur@state.co.us>, "Mike.leonard@state.co.us" <Mike.leonard@state.co.us>, Ryan Dodson <rmr@rampartenergy.com>, Rhonda Gathers <rgg@rampartenergy.com>, Land <land@rampartenergy.com>, David Andrews <david.andrews@state.co.us>

Hi Kim,
Thanks for your patience, and your reminders!

The Form 10s you provided do not include the Schrader J-8 and Schrader J-12 wells that are listed as having failed final reclamation inspections, likely because they were plugged prior to those transfers. Therefore, the reclamation obligation remains with the plugging operator.

I see that the Schrader J-8 was previously inspected in 2005, with notes that the pumping unit base and other equipment remained and the site was unreclaimed. Current aerial images indicate that crop is growing, so we can schedule a follow up final reclamation inspection and hopefully the site is ready to pass. Rule 1004.c.(4), requires (and did at the time of PA) an operator to submit a Form 4 Sundry notice when the site is ready for a final reclamation inspection; I do not see any records in the well file indicating this form was submitted. For the record, the likely SHL for this well is Latitude: 40.46596 Longitude: -103.435024, which is approximately 300' NNE of the well spot on our maps. There is an historic disturbance visible there in pre-2017 aeriels.

The Schrader J-12 had a failed Final Reclamation Inspection issued in 2017 which indicated that Corrective Actions from a 2005 failed Final Reclamation Inspection had not been addressed. Like the J-8, this site may be reinspected when the work is complete and the site is ready for inspection. Also, like the J-8, it appears that the well location is 300-350' NNE of the well spot on COGCC maps.

Pit Facility 265650 (Adena Inj. Plant Overflow) was permitted by Babcock & Brown in 2002. Records can be found in the scout card here: <http://cogcc/cogisdb/Facility/FacilityDetail?facid=265650>. Interestingly, there is another pit record (Facility ID 116781) which received Closure under Remediation Project #64 in 1999. However, this other facility closure does not remove the requirement for proper closure of Pit Facility 265650. Please see Rule 911 for facility closure information. In the alternative, Rampart may work with the current operator of the Adena Injection Plant to follow the process described in Rule 218 to transfer the ownership of and responsibility for the Pit Facility.

Remediation Project Number 3250 will be handled through the COGCC Orphaned Well Program.

Spill/Release Facility ID 139556 will be handled through the COGCC Orphaned Well Program.

I will review internally what steps need to be taken to remove the last 2 items from the list, but COGCC considers the prior 3 issues to be the full responsibility of Rampart Energy and will not release financial assurance until reclamation has been documented as complete and the pit has been documented as closed or transferred to another company in compliance with COGCC rules.

I hope that this provides the information that you need to move forward.

Thanks,
Greg

On Wed, Sep 7, 2022 at 3:13 PM Kim Mohr <kjm@rampartenergy.com> wrote:

Greg,

Hope you had a nice holiday weekend.

It's been another couple of weeks so I thought I would check in to see if there is any progress on how the COGCC would like Rampart to proceed with outstanding reclamation issues?

Thank you.

Kim

From: Deranleau - DNR, Greg <greg.deranleau@state.co.us>
Sent: Thursday, August 18, 2022 2:34 PM
To: Kim Mohr <kjm@rampartenergy.com>
Cc: Denise.arthur@state.co.us; Mike.leonard@state.co.us; Ryan Dodson <rmd@rampartenergy.com>; Rhonda Gathers <rgg@rampartenergy.com>; Land <land@rampartenergy.com>
Subject: Re: Rampart Energy Company / 5685

Thanks, Kim. The Babcock and Brown thing may have been what was throwing me off. That will help.

Greg

On Thu, Aug 18, 2022 at 1:24 PM Kim Mohr <kjm@rampartenergy.com> wrote:

Greg,

Attached per your request are the Form 10's – Change of Operator to Legado DJ LLC approved by COGCC on 7/11/2008.

Legado DJ LLC sold to Benchmark Energy LLC in August of 2011 as evidenced by the attached COGCC surety information.

For your information I have also attached a Delaware Certificate of Amendment changing our name from Babcock & Brown Energy, LLC to Rampart Energy Company effective December 1, 2008.

Please let me know if you need anything further to assist in the process.

Thank you.

Kim

From: Deranleau - DNR, Greg <greg.deranleau@state.co.us>
Sent: Thursday, August 18, 2022 10:43 AM
To: Kim Mohr <kjm@rampartenergy.com>
Cc: Denise.arthur@state.co.us; Mike.leonard@state.co.us; Ryan Dodson <rmd@rampartenergy.com>; Rhonda Gathers <rgg@rampartenergy.com>; Land <land@rampartenergy.com>
Subject: Re: Rampart Energy Company / 5685

Kim,

We are still looking at this internally. We've noted that there have been multiple bond release requests where Rampart was provided with a "bond review report," but no responsive information was received to change the status. We are taking a look at a couple of issues identified on the report as related to the Benchmark OWP work, but that will take additional research. Can you provide copies of the Form 10s that affected the operator change, or at least a document number, as we are having trouble tracking that down.

Thanks,

Greg

On Mon, Aug 15, 2022 at 11:26 AM Kim Mohr <kjm@rampartenergy.com> wrote:

Good Morning Greg,

A reminder, as requested...

It's been a couple of weeks and to date we have not heard back from anyone.

How would you like Rampart to proceed?

Please advise.

Thank you.

Kim

From: Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Sent: Wednesday, July 27, 2022 3:14 PM

To: Kim Mohr <kjm@rampartenergy.com>

Cc: Denise.arthur@state.co.us; Mike.leonard@state.co.us; Ryan Dodson <rmd@rampartenergy.com>; Rhonda Gathers <rgg@rampartenergy.com>

Subject: Re: Rampart Energy Company / 5685

Kim,

Thanks for reaching out. This is a fairly complex set of questions and unique circumstances that will take us some time to research. I appreciate that you are anxious to get your bond back after 10 years; however, please also appreciate that the very purpose of the financial assurance is to ensure that facility closure, environmental, and reclamation liabilities are properly managed by the operator or operators and do not become a burden to the state.

If you don't hear back from us on this in a couple weeks, please feel free to remind me.

Thanks,
Greg

On Tue, Jul 26, 2022 at 2:57 PM Kim Mohr <kjm@rampartenergy.com> wrote:

Denise,

Rampart hereby requests the COGCC's advice on how to proceed with resolving some reclamation issues still showing under Rampart Energy Company, operator # 5685.

Rampart Energy Company has not owned or operated any oil & gas facilities in the state of Colorado since 2012. With that information in mind, I spoke with Deborah Lutz, Financial Assurance Supervisor, about releasing our bond. After researching, Deborah sent us five (5) outstanding reclamation violations still under Rampart (5685) that need to be resolved before our bond can be released. A copy of the information is

attached (note 3 tabs at bottom of the spreadsheet & issues are highlighted). I have added notes regarding ownership changes & sale dates. As you can see, all the areas in question were sold to various entities that are now bankrupt or out of business and, the associated wells are part of the Orphan Well Program.

On 7/21/2022 Ryan Dodson, Rampart's field engineer, called PCR, current operator of the Adena Unit to get permission to access the property. He explained that he was trying to resolve an old pit violation still on the records with the COGCC under Rampart's name. The operator said that was resolved years ago and denied Ryan access to the Adena injection facility.

As mentioned, Rampart Energy Company has not owned or operated any oil & gas facilities in Colorado since 2012 which makes resolving these issues a problem as we no longer hold any of the leases, and therefore do not have rights or access to the properties in question. In the case of the Schrader wells, the violation states that pumping unit & base remains and to remove debris and reseed. These wells, leases and equipment were sold to Red Mountain Resources 9/1/2011 and a letter from RMR dated 9/6/2011 accepting responsibility for same.

Thank you in advance for taking the time to assist us in the resolution of these issues.

Kim

Kim J. Mohr | Land Assistant

Rampart Energy Company

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Denver, Colorado 80202

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Direct: 303-376-3610

kjm@rampartenergy.com



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Greg Deranleau
Environmental Manager

(he/him/his)



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

The mission of the COGCC is to regulate the development and production of the natural resources of oil and gas in the state of Colorado in a manner that protects public health, safety, welfare, the environment and wildlife resources.

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Environmental Manager

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Cc as "CORRESPONDENCE" 9/13/2022:

Facility 265650

Location ID 387264, Well ID 05-075-05067

Location ID 387259, Well ID 05-075-05062

REM 3250

Spill Facility 139556