



# COLORADO

## Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

[www.colorado.gov/ecmc](http://www.colorado.gov/ecmc)

### WARNING LETTER # 403639040

01/17/2025

GRAND VALLEY RESOURCES INC (# 35095)

EARL FIX

[joycefix@yahoo.com](mailto:joycefix@yahoo.com)

P O BOX 39

RANGELY, CO 81648

ANDERSON-GOVERNMENT 17-2 (API# 103-07676)

NWNE, 17, 2N, 103W, RIO BLANCO

**This Warning Letter is to inform you that GRAND VALLEY RESOURCES INC (“Operator”) may be in violation of the rules and regulations of the Colorado Energy and Carbon Management Commission (“ECMC”) and corrective action is required.**

ECMC has reasonable cause to believe that Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which ECMC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

#### **Alleged Violation(s) and Required Corrective Action(s):**

##### 219 Form 10, Certificate of Clearance

Violation Date: 09/11/2024

Violation Discovery Date: 09/11/2024

Description of Alleged Violation: No current Certificate of Clearance on file, previous transported ceased operations in state in 2004 (Intermarco)

Required Corrective Action: Provide updated Form 10 Certificate of Clearance with all current transporters and/or gatherers.

Corrective Action Deadline Date: 02/15/2025

##### 413 Form 7, Operators Monthly Report of Operations

Violation Date: 01/17/2025

Violation Discovery Date: 01/17/2025

Description of Alleged Violation: Operator is receiving this letter because, based on ECMC records, ECMC has reason to believe the Well(s) indicated above and/or in the attached table presents one or more compliance issues. Operator should review its records to verify if any Monthly Reports of Operations (“Form 7”), are missing, inaccurate, or incomplete for this Well.

Pursuant to Rule 413.a., Operator is required to submit Form 7 for all existing oil and gas wells that are



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not plugged and abandoned, within 45 days after the end of each month. Operator is required to report the well every month from the month it is spud until it has been reported for one month as abandoned. Operator is required to report each formation that is completed in a well every month from the time that it is completed until one month after abandonment.

Pursuant to Rule 413.b., Operator is required to report the volume of specific fluids injected into a Class II Underground Injection Control well on a Form 7, within 45 days after the end of each month. The specific Class II fluids on Form 7 are produced fluids and any gas or fluids used during enhanced recovery unit operations; including produced water and fluids recovered during drilling, casing cementing, pressure testing, completion, workover, and formation stimulation of all oil and gas wells including production, exploration, injection, service and monitoring wells. Injection of any other Class II fluids requires separate volume reporting on a Form 14, as described in Rule 808.b.

If Operator failed to file Form 7, Monthly Reports of Operations, or has filed incomplete or inaccurate information for the Well, then Operator violated Rule 413.

Last reported July 2024.

**Required Corrective Action:** Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports. Operator shall send an email to the ECMC Representative indicated below, confirming that all required Form 7s are submitted, accurate, and up-to-date; and detailing an internal procedure for timely compliance with Rule 413. in the future. Operator shall reference this Warning Letter document number in the subject of the email.

**Corrective Action Deadline Date:** 02/15/2025

### 419 Bradenhead Monitoring, Testing, and Reporting

**Violation Date:** 12/28/2023

**Violation Discovery Date:** 12/28/2023

**Description of Alleged Violation:** Pursuant to Rule 419, all wells will have an annual Bradenhead test reported to the ECMC.

As the operator of record, you have failed to report a Bradenhead test for 2022 and/or 2023 at one or more wells.

**Required Corrective Action:** Operator shall review its records to verify if any Forms or Notices related to Bradenhead testing were late or are still outstanding for these Wells. Operator shall submit any delinquent forms, notices, or reports; and correct any incomplete or inaccurate reports.

Where Operator has failed to perform a Bradenhead Test in [YEAR], a test shall be performed by the Corrective Action Date listed below. Pursuant to Rule 420, Operator is required to submit the results of BH tests to ECMC within 10 days of completion. Operator shall submit such results by filing a Bradenhead Test Report, Form 17, which shall include a wellbore diagram if not previously submitted or if the wellbore configuration has changed, and the results of any gas and liquid analysis, if sampled.

Additionally, Operator shall send an email to the ECMC Representative indicated below, detailing an internal procedure for timely compliance with Rule 419. Operator shall reference this Warning Letter document number in the subject of the email.



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If the Bradenhead test requirements do not apply per rule 614.e or tribal involvement, please email a list of those wells to the area engineer with the reason the test is not required.

Notes: This test or missing form is being accepted in lieu of the required 2022 and/or 2023 Bradenhead test. The operator must still perform an additional Bradenhead test by December 31, 2024, for the 2024 Bradenhead test.

Guidance for Rule 419 is available on the ECMC website at:

Regulation – Operator Guidance - BRADENHEAD MONITORING , TESTING , MITIGATION, AND REPORTING

<https://ecmc.state.co.us/reg.html#/opguidance>

If Bradenhead testing cannot be performed a Variance to Rule 419 is required.

Please send questions to [dnr\\_ECMC\\_outreach@state.co.us](mailto:dnr_ECMC_outreach@state.co.us)  
Corrective Action Deadline Date: 02/15/2025

### **How to Comply with Warning Letter:**

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the ECMC staff identified below by the Corrective Action Deadline Date(s):

ECMC Representative: Meredith Greager

Title: REPRESENTATIVE

Phone Num: (   )

Email: [meredith.greager@state.co.us](mailto:meredith.greager@state.co.us)

If you have any questions about this Warning Letter, please contact the ECMC Representative identified above.

### **Failure to Comply with Warning Letter:**

If Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above ECMC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

### **Disclaimers:**

If the alleged violation(s) in this Warning Letter are the subject of previously issued Notice(s) of Alleged Violation ("NOAV") or Enforcement Order(s) ("Order"), Operator's obligations and the corrective actions and deadlines in such NOAV or Order stand and are not affected by this Warning Letter.

If issued in error, the Enforcement Unit reserves the right to rescind this Warning Letter prior to the ECMC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.

All well data, rules and forms are available on our website at [www.colorado.gov/ecmc](http://www.colorado.gov/ecmc).

Sincerely,

Meredith Greager  
REPRESENTATIVE



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**Attachments**

View Attachments in Imaged Documents on ECMC website <http://ecmcweblink.state.co.us/> Search by Document Number.

**Document Number**   **Description**

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Total Attach: 0 Files