



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 404244534

06/18/2025

BISON IV OPERATING LLC (#10670)

KATIE GILLEN

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518 17TH STREET SUITE 1800

DENVER, CO 80202

CE 5-68 11-3-1H (API# 069-06543)

SENE, 11, 5N, 68W, LARIMER

This Warning Letter is to inform you that BISON IV OPERATING LLC (“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):

419 Bradenhead Monitoring, Testing, and Reporting

Violation Date: 06/17/2025

Violation Discovery Date: 06/17/2025

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 2024 at one or more wells.

The following wells (listed by API number) missed Bradenhead tests in 2024 and will require Corrective Actions:

069-06543

069-06544

069-06545

069-06546

069-06547

069-06551

069-06553

123-33345

123-34091

123-46637



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123-46639
123-47309
123-47975
123-47976
123-47977
123-47978
123-47979
123-47980
123-47981
123-47982
123-50372

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 2024, 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

For a given calendar year, Operator can find well listings for submitted Bradenhead tests and missing Bradenhead tests by using the tool available in WebForms (upper righthand corner of dashboard). It is suggested that the tool is utilized for identifying any outstanding Bradenhead tests for the identified year and proceeding accordingly.

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 2024 Bradenhead test. The operator must still perform an additional Bradenhead test by December 31, 2025, for the 2025 Bradenhead test.

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

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

<http://ecmc/documents/reg/OpGuidance/Operator%20Guidance%20for%20Bradenhead%20Monitoring%20Testing%20Reporting.pdf>

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

Please send questions to dnr_ECMC_outreach@state.co.us



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Corrective Action Deadline Date: 07/31/2025

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: Greager, Meredith
Email: meredith.greager@state.co.us

Title: Engineering QA Specialist
Phone Num: (720) 830-4175x

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.

Sincerely,

Greager, Meredith
Engineering QA Specialist

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