## ECMC 2nd Quarter 2025 HB 14-1356 Report

Operator	Operator #	NOAV Nos.	NOAV Date	Violations in Order	Penalty (Total)	Penalty Imposed on Defunct and/or Non- Responsive Operator (Y/N)	Penalty (Suspended)	Penalty Days	Daily Penalty	Aggravating Factors	Mitigating Factors	Pattern of Violation (Y/N)	Gross Negligence or Knowing & Willful misconduct (Y/N)	AOC or OFV	Other Rationale	Docket No.	Order No. (1V)	Final Order Date
Anschutz Exploration Corp.	3104	403635545; 403645842	12/28/2023; 1/5/2024	419.c.	\$234,000	N	\$219,000	90	\$2,600	N	N	N	N	AOC	Duration Matrix; Suspended Penalty	250100009	976	4/9/2025
Phoenix Resources LLC	10691	403651432	1/11/2024	413; 606.a.; 606.c.; 902; 905	\$1,146,778	Υ	\$1,146,778	13,567	\$85	N	N	N	N	OFV	Duration Matrix; Suspended Penalty	240500117	966	4/10/2025
Beren Corporation	7800	403548892; 403556888; 403556904; 403556913	10/11/2023	417.f; 417.a.(4).A	\$402,000	N	\$240,000	280	\$1,436	N	N	N	N	AOC	Duration Matrix; Settlement Inducement	240200043	978	5/5/2025
Baird* Jerry	5852	403645926	1/5/2024	419.c.	\$262,540	N	\$252,540	483	\$544	N	N	N	Ν	AOC	Duration Matrix; Suspended Penalty	250200030	985	5/28/2025
SG Interests	77330	402844685	10/18/2021	902.b.	\$577,500	N	\$519,750	220	\$2,625	N	N	N	N	AOC	Duration Matrix; Suspended Penalty	240700177	981	5/30/2025
James R. & Natalie Greer	35720	403175933; 403658664; 403760147	9/22/2022; 1/18/2024; 4/18/2024	205.c; 702.b; 205.c	\$8,959	Υ	\$8,959	1,288	\$7	N	N	N	N	OFV	Duration Matrix; Settlement Inducement	240600137	944	6/7/2025
Citation Oil & Gas Corp.	17180	403635583	1/4/2024	419.c.; 420	\$409,583	N	\$292,383	33,650	\$12	N	N	N	N	AOC	Duration Matrix; Rule Reclassification; Suspended Penalty	241000252	968	6/9/2025
North Shore Exploration and Production LLC	10724	403052898; 403257772	5/18/2022; 12/22/2022	417.b.	\$52,703	N	\$0	1,092	\$48	N	N	N	N	AOC	Duration Matrix; Settlement Inducement	240600132	988	6/25/2025

Total Penalties Assessed: \$3,094,063

## A. Aggravating Factors

- 1. The violator acted with gross negligence or knowing and willful misconduct.
- 2. The violation resulted in significant waste of oil and gas resources.
- 3. The violation had a significant negative impact on correlative rights of other parties.
- 4. The violator was recalcitrant or uncooperative with the Commission or other agencies in correcting or responding to the violation.
- The violator falsified reports or records.
- 6. The violator benefited economically from the violation, in which case the amount of such benefit shall be taken into consideration.
- 7. The violator has engaged in a pattern of violations.
- 8. The violation led to death or serious injury.

## **B.** Mitigating Factors

- 1. The violator self-reported the violation.
- 2. The violator demonstrated prompt, effective and prudent response to the violation, including assistance to any impacted parties.
- 3. The cause of the violation was outside of the violator's reasonable control and responsibility, or is customarily considered to be force majeure.
- 4. The violator made a good faith effort to comply with applicable requirements prior to the Commission learning of the violation.
- 5. The cost of correcting the violation reduced or eliminated any economic benefit to the violator, excluding circumstances in which increased costs stemmed from non-compliance.
- 6. The violator has demonstrated a history of compliance with the Act, and Commission rules, orders, and permits.