

**ECMC 4th 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
Hubbs III, LLC	41440	404190421	5/5/2025	702.d.	\$164,030	Y	\$164,030	478	\$343	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	250700129	1000	9/17/2025
Gerald D. Mowrer	60792	403659139; 403760438; 403174933	1/18/2024; 4/18/2024; 9/22/2022	205.c; 702.b	\$0	Y	\$0	1,824	\$0	N	N	N	N	OFV	Domestic Well; Duration Matrix; Financial Assurance Foreclosure; Inability to Pay	240600135	982	10/13/2025
Willsource Enterprise, LLC	96790	403175710	9/22/2022	205.c.	\$3,530	Y	\$3,530	160	\$200	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	221100291	991	11/5/2025
Retamco Operating Inc.,	74290	403258731; 403636224	12/13/2022; 1/4/2024	419.c; 420	\$7,184,580	N	\$6,945,580	21,119	\$340	N	N	N	N	AOC	Duration Matrix; Rule Reclassification; Suspended Penalty	250400072	1001	11/13/2025
Ausco Petroleum Inc.	10412	403258318; 403635578; 403257993; 403347241	12/13/2022; 1/4/2024; 12/12/2022; 3/15/2023	417.b.; 418.b.; 419.c.; 420	\$1,585,400	N	\$1,544,400	5,651	\$281	N	N	N	N	AOC	Duration Matrix; Suspended Penalty; Inability to Pay; Rule Reclassification	240100008; 240100001	974	11/26/2025
NGL Water Solutions DJ LLC	10373	403635854	1/4/2024	420	\$22,187	N	\$17,187	3,044	\$7	N	N	N	N	AOC	Duration Matrix; Suspended Penalty	250800163	1006	11/26/2025
Fritz & Digman, Inc.	31250	404288971	7/22/2025	434.a.; 902.a.; 912.a.	\$1,552,550	Y	\$1,552,550	273	\$5,687	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	250700136	1005	11/26/2025

Big Run Production Company	8455	403635580	1/4/2024	419.c.	\$280,959	N	\$264,959	1,281	\$219	N	N	N	N	AOC	Duration Matrix; Suspended Penalty	250400054	987	12/12/2025
Fortitude Exploration Co	30560	403174622	9/22/2022	205.c.	\$5,148	Y	\$5,148	1,201	\$4	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	230400137	877	12/12/2025
Declar Oil & Gas, Inc.	23320	404230273	6/5/2025	912.a.; 912.b.; 1004.a.	\$674,510	Y	\$674,510	6,268	\$108	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	250700126	1004	12/15/2025
Noble Energy Inc.	100322	404310203	8/8/2025	207	\$2,570	N	\$0	207	\$12	N	N	N	N	AOC	Settlement Inducement	250900183	1007	12/16/2025
PCR Operating LLC	10657	403151602; 403151659; 403205275	8/30/2022; 8/30/2022; 10/21/2022	707.a.; 326.a.; 419	\$8,242,050	Y	\$8,242,050	49,661	\$166	N	N	N	N	OFV	Duration Matrix; Financial Assurance Foreclosure; Inability to Pay; Suspended Penalty	221100315	951	12/18/2025
Eagle Operating Inc.	26155	403635789	1/4/2024	419.c.	\$177,766	N	\$163,766	1,572	\$113	N	N	N	N	AOC	Duration Matrix; Suspended Penalty	250900192	1010	12/22/2025

Total Penalties Assessed: \$19,895,280

#### 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.
5. 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.