

Data Integrity Update

07/23/2025

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COLORADO

Energy & Carbon Management
Commission

Department of Natural Resources

**[ecmc.colorado.gov/
data-maps-reports/
special-projects](http://ecmc.colorado.gov/data-maps-reports/special-projects)**



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**Energy & Carbon Management
Commission**

Department of Natural Resources

Discussion points

1. Investigation methodology
2. Investigation findings
3. Remediation requirements
4. Notices of Alleged Violation
5. Description of next steps
6. Questions

Investigation Methodology & Findings



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**Energy & Carbon Management
Commission**

Department of Natural Resources

Environmental Data Unit

- The Environmental Data unit was formed to primarily to review and maintain analytical data received through the Form 43, including baseline water quality, produced water, and production fluids and gas.
- The EDU has experience with investigations that require assembling and interpreting large amounts of data and assists other units with investigations that require the review of large amounts of data extracted from ECMC databases.

What is Table 915-1

- Rule 915 sets the the minimum cleanup standards for both spills and oil/gas location closure projects.
- Table 915-1 lists the required maximum allowable concentrations by Contaminant of Concern (COC) for both soil and groundwater.

What is a Form 27?

Operators are required to complete a Form 27 (Site Investigation and Remediation Work Plan) for several reasons, including the closure of oil and gas facilities and the cleanup of spills.

- A standard Form 27 includes several hundred data fields.
- Much of the information is attached as PDFs, including lab reports, data tables, figures, maps, etc.
- ECMC Environmental Staff processed 16,000 Forms 27s in 2024.
- Form 27 data is posted publicly on the ECMC website upon review and approval (or denial) by staff.

Pre-investigation timeline

ECMC's awareness of the scope and scale of the issue as well as access to actionable intelligence grew over time.

July 2024: State Attorney General's Office was contacted by Eagle counsel about instances of data falsification related to Chevron.

August 2024: ECMC receives notification directly from Oxy about data integrity issues.

September 2024: ECMC begins receiving limited data tables from Eagle Consultants via counsel.

September 2024: ECMC begins evaluating data tables.

October 2024: ECMC receives notification directly from Chevron and begins discussions on their investigation progress.

Initial Disclosure of Data Falsification

- In **November 2024**, ECMC announced that two environmental consultants hired by oil and gas operators submitted falsified laboratory data reports to ECMC between 2021 and 2024.
 - Eagle Environmental Consulting, Inc. (Chevron & later, Civitas)
 - Tasman Geosciences (Oxy)
- All falsified data was submitted through the Form 27 (Site Investigation and Remediation Work Plan).

Investigation launch timeline

ECMC's awareness of the scope and scale of the issue as well as access to actionable intelligence grew over time.

October 2024: ECMC formally commences investigation;
ECMC Interim Director issues memo to staff.

November 2024: ECMC publicly announces data integrity concern.

December 2024: ECMC receives notification from Civitas of similar data integrity issues.

December 2024: ECMC publicly posts datasets and known locations.

Review of Data (to date)

- Staff has reviewed spreadsheet data detailing falsified data identified through the operator's internal investigations.
- To date Staff has reviewed over 1,000 pdfs.
 - Of those, staff reviewed 683 lab reports by all three operators.
 - Of those, staff compared 520 original 'unlocked' lab reports to submitted lab reports from Chevron.
- Staff has reviewed a total of 3,275 individual instances of falsified data provided by the three operators involved.
 - Of those, over 2,800 instances of data falsification can be attributed to Chevron remediation projects.

Summary of Data

Operator Reported Falsified Data

Operator	Number of Remediation Projects	Number of lab Reports	Number of Data Points
Chevron	284	520	1681
Civitas	46	81	287
Oxy	74	82	126

ECMC additionally identified:

- 1,100 altered data fields not reported by Chevron

Results of Investigation: Locations & Operators

404 remediation projects all in Weld County operated by

- Chevron (Noble Energy)
- Oxy (Kerr McGee)
- Civitas (made up of subsidiary companies 8 North, Bonanza Creek Energy, Crestone Peak, Extraction Oil and Gas, and Highpoint Operating).

Results of Investigation: Location Status

- Closed: No further Action granted prior to the ECMC DFI, these sites were previously closed based on information provided to the ECMC on Form 27s.
- Active: Under active remediation at the time data investigation began.

Count of Data Falsified Remediation Sites		
Total Sites	Total Active	Total Closed
404	187	217

The list of locations and maps is attached to this presentation and posted online.

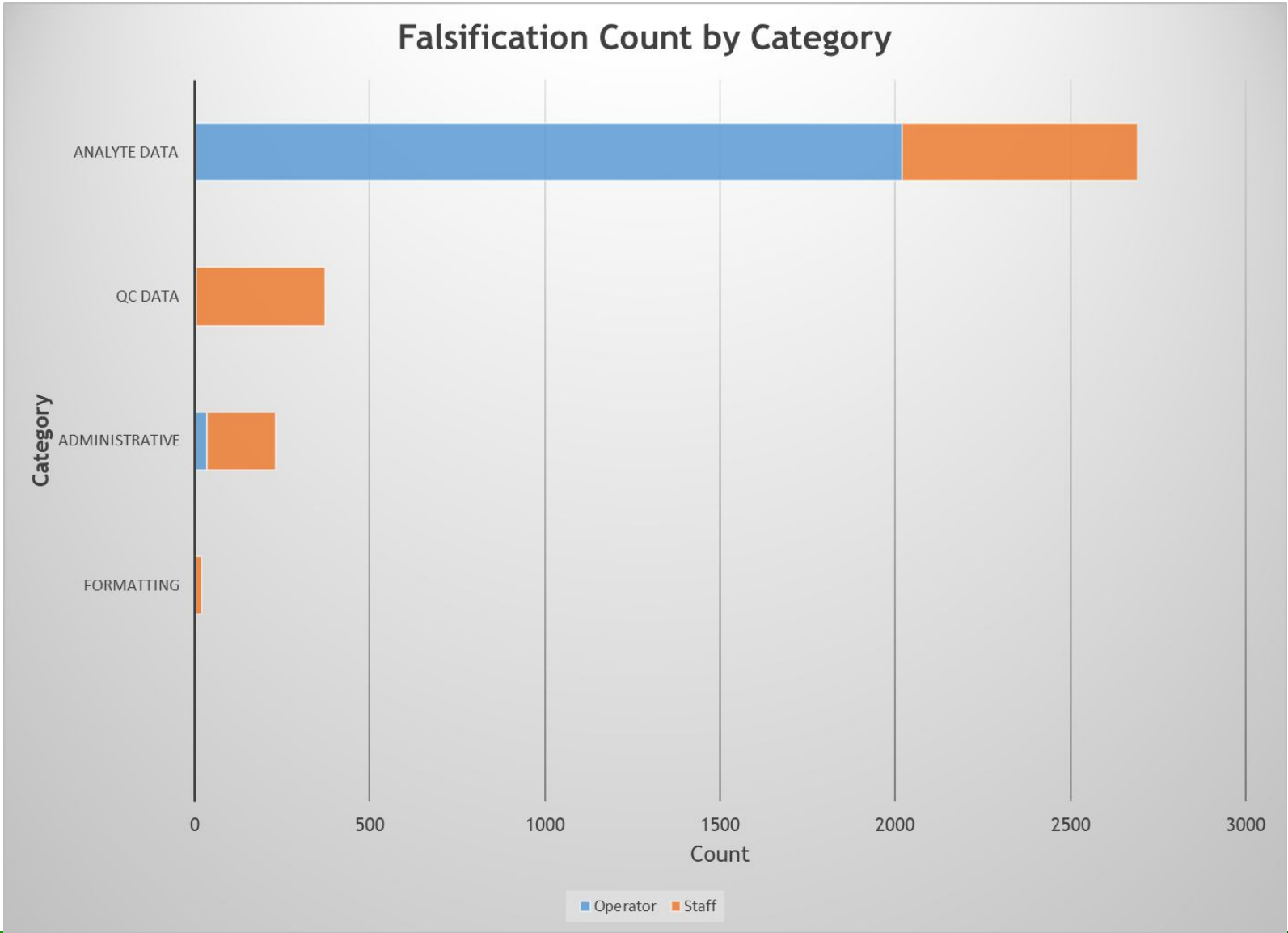
Results of Investigation: Location & Status + Operator

Remediation Projects by Municipality						
Municipality	Total Remediation Projects	Active	Closed	OXY Sites	Chevron Sites	Civitas Sites
BERTHOUD	4	1	3	4	0	0
DACONO	2	0	2	2	0	0
ERIE	2	0	2	2	0	0
EVANS	7	2	5	0	7	0
FIRESTONE	4	2	2	3	0	1
FORT LUPTON	1	0	1	1	0	0
FREDERICK	3	1	2	2	0	1
GREELEY	8	6	2	0	8	0
JOHNSTOWN	2	0	2	2	0	0
KEENESBURG	2	0	2	0	2	0
KERSEY	1	0	1	0	1	0
MILLIKEN	8	3	5	2	6	0
NORTHGLENN	1	0	1	1	0	0
PLATTEVILLE	5	1	4	5	0	0
SEVERANCE	2	0	2	0	2	0
WINDSOR	3	0	3	3	0	0
WELD CO	349	171	178	47	258	44
Total	404	187	217	74	284	46

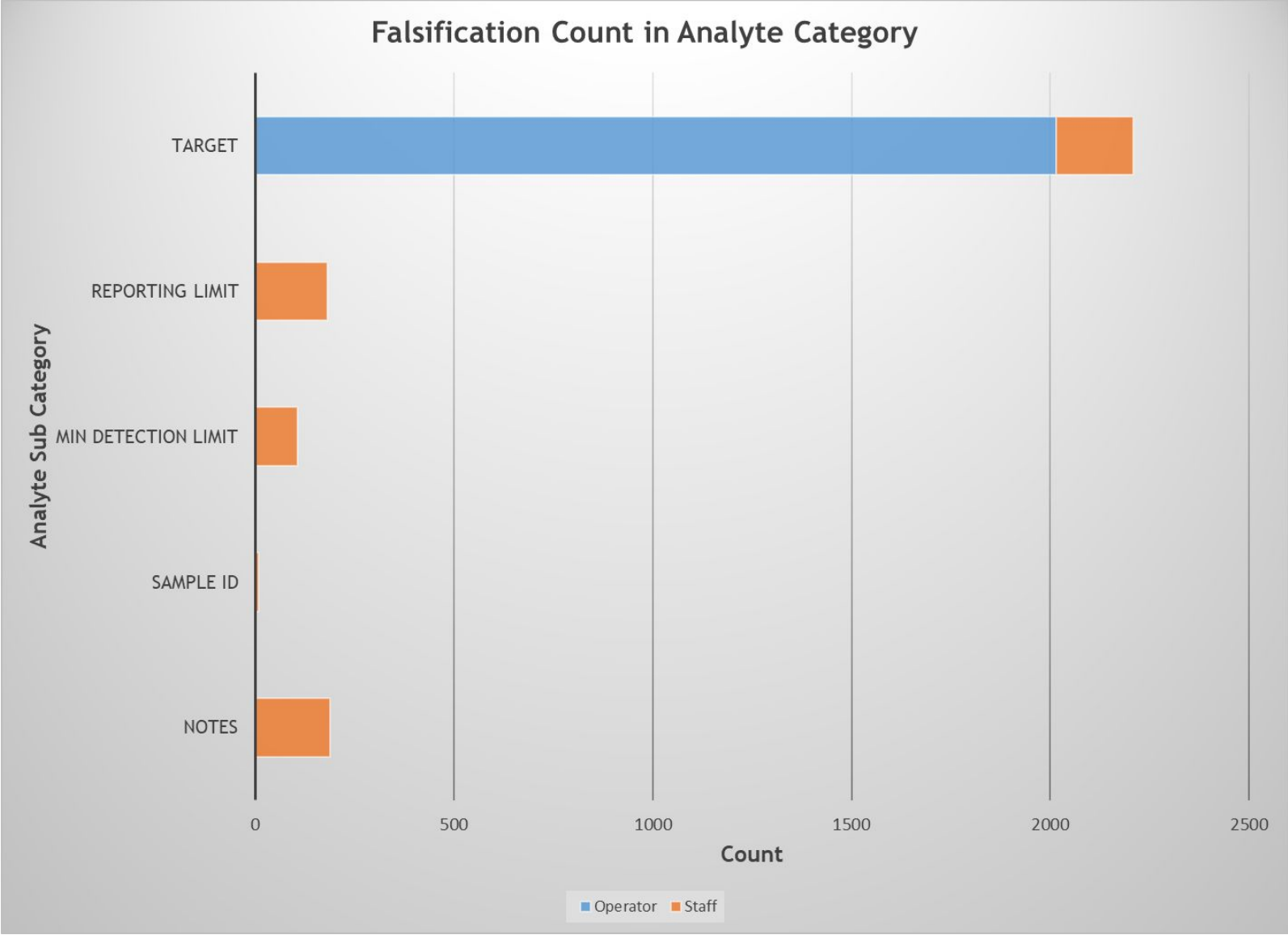
Results of Investigation: categories of falsified data

- Analyte data
 - Targets (result)
 - Notes and text
 - Reporting limits
 - Min Detection Limit
 - Sample ID label
- QC Data
 - Spikes
 - Relative % Difference
 - QC_%REC
 - QC_Surrogate
 - QC_Dilution
- Formatting
 - Column removed/reformatted
 - Column added
 - Project name/misnamed
 - Duplicated data
- Administrative
 - Notes
 - Dates
 - Staff signature
 - Assigned Staff Analyst

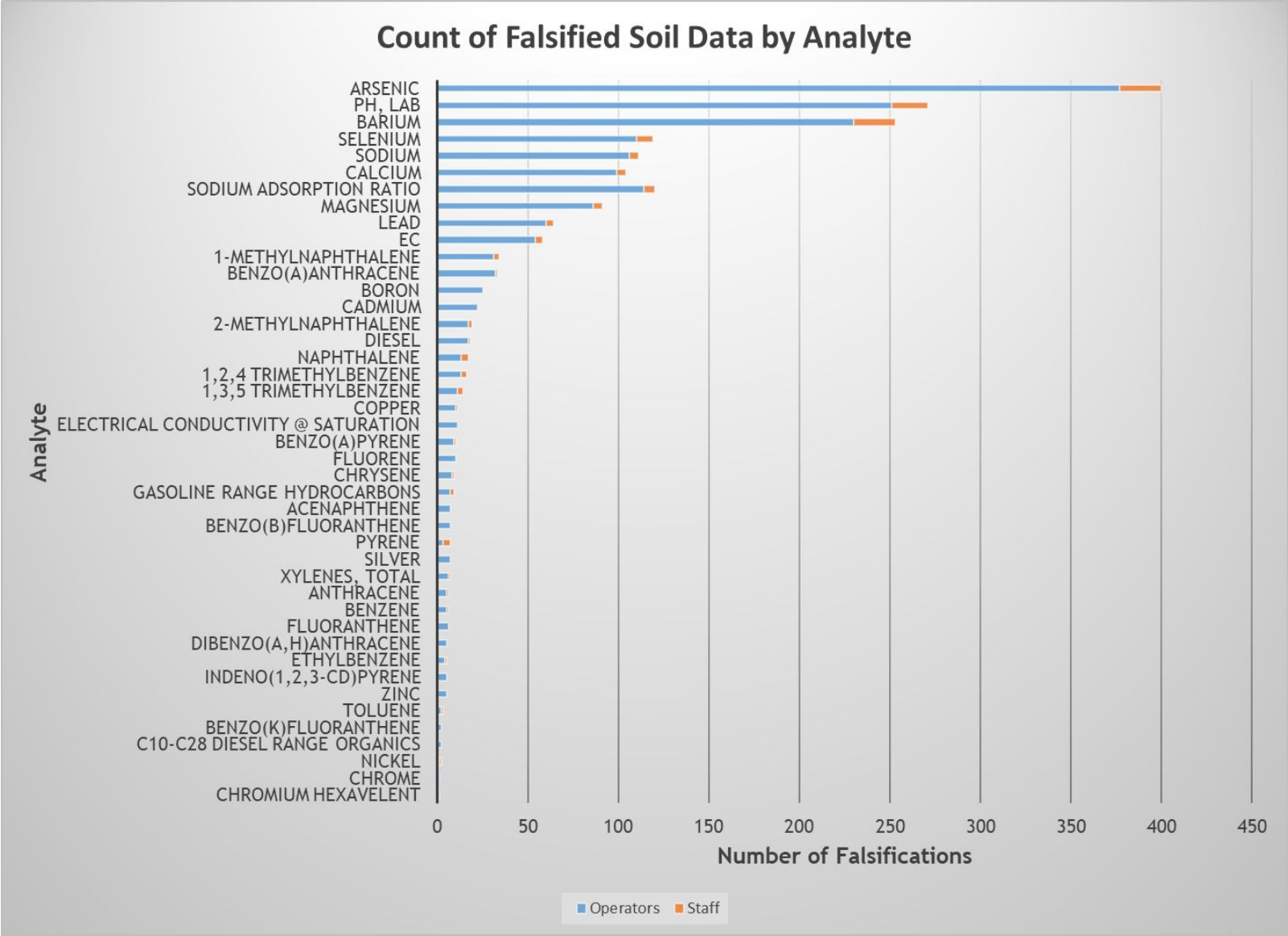
Results of Investigation: Table 915-1



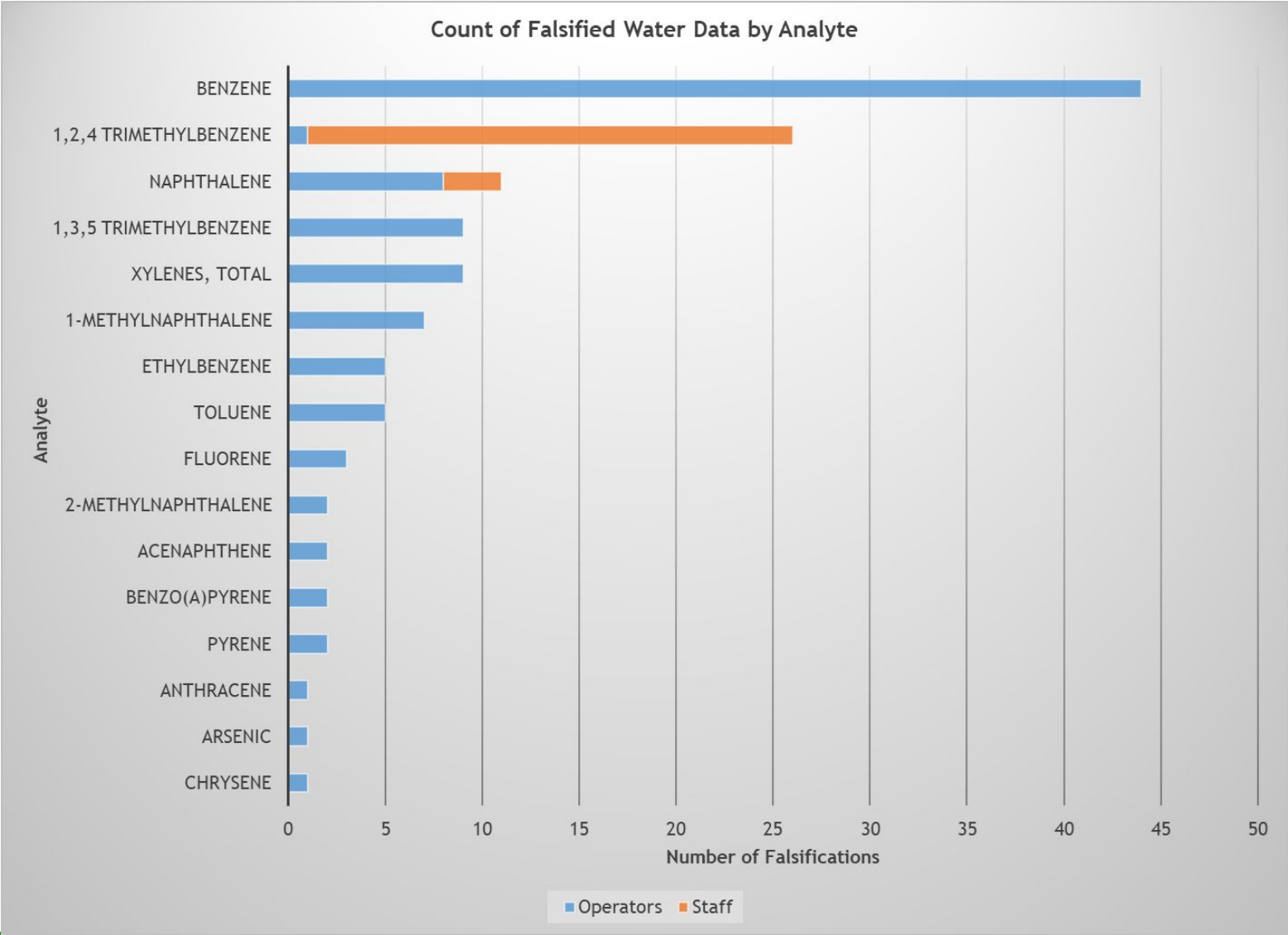
Results of Investigation: Table 915-1



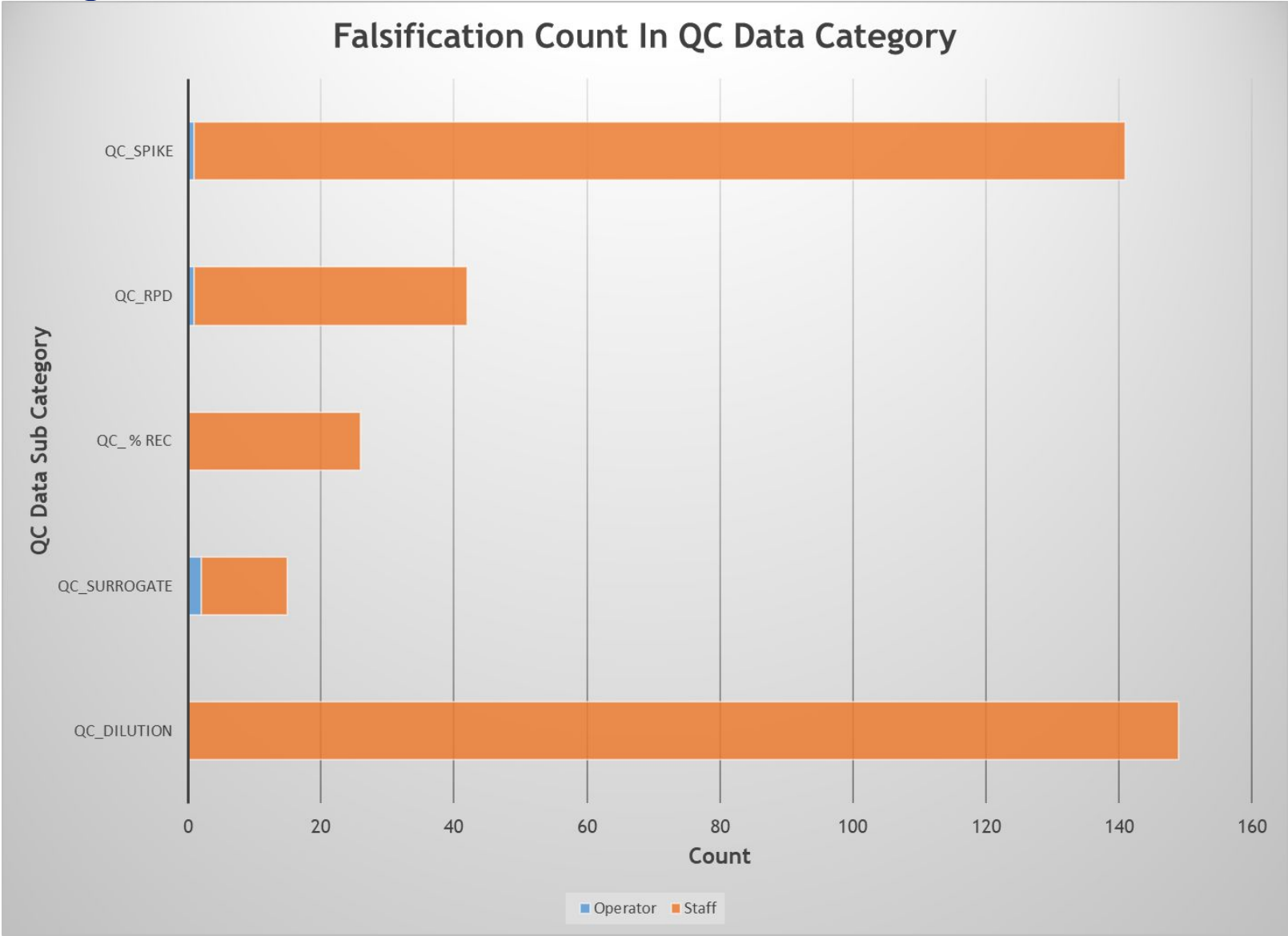
Results of Investigation: Table 915-1



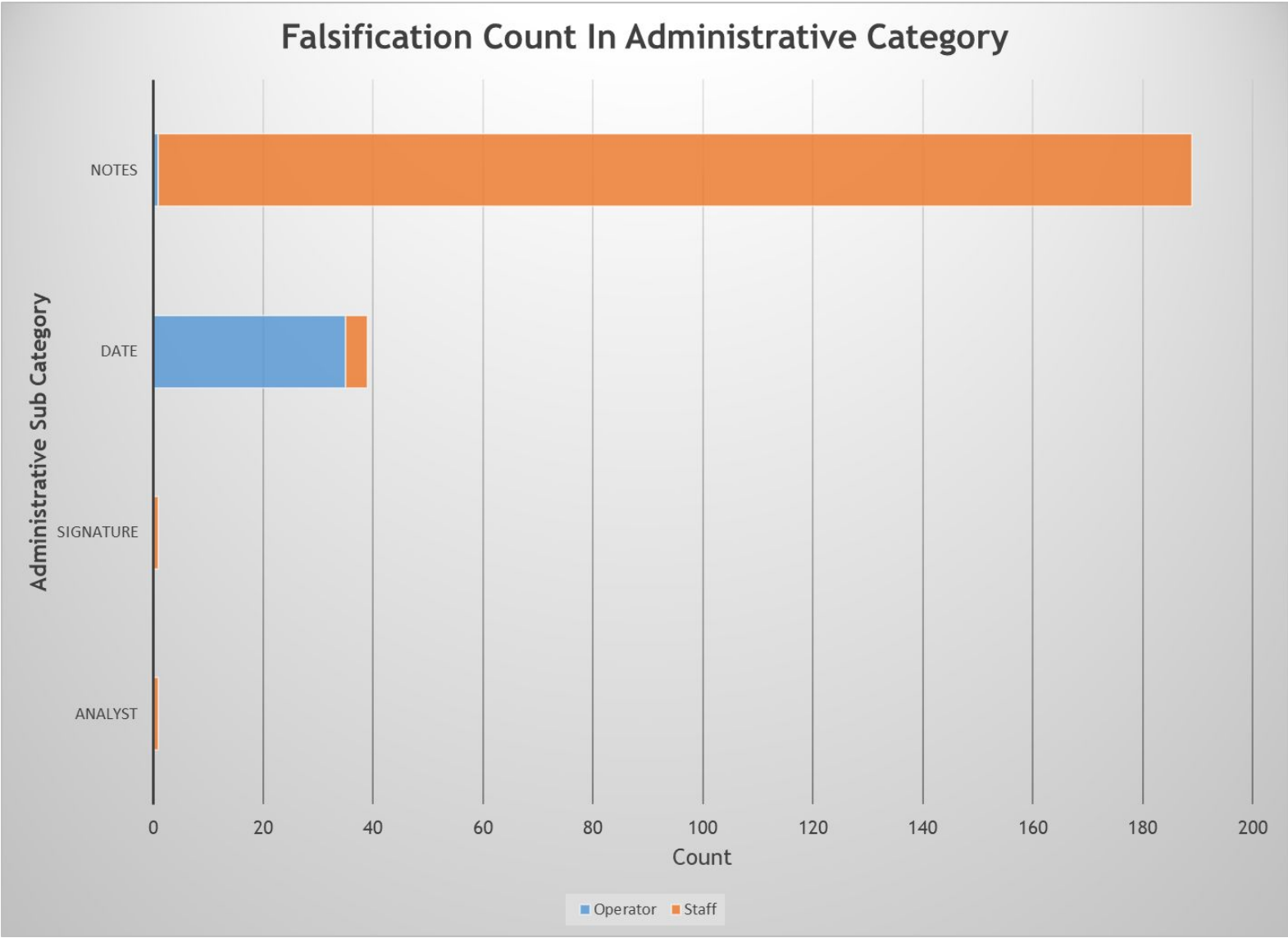
Results of Investigation: Table 915-1



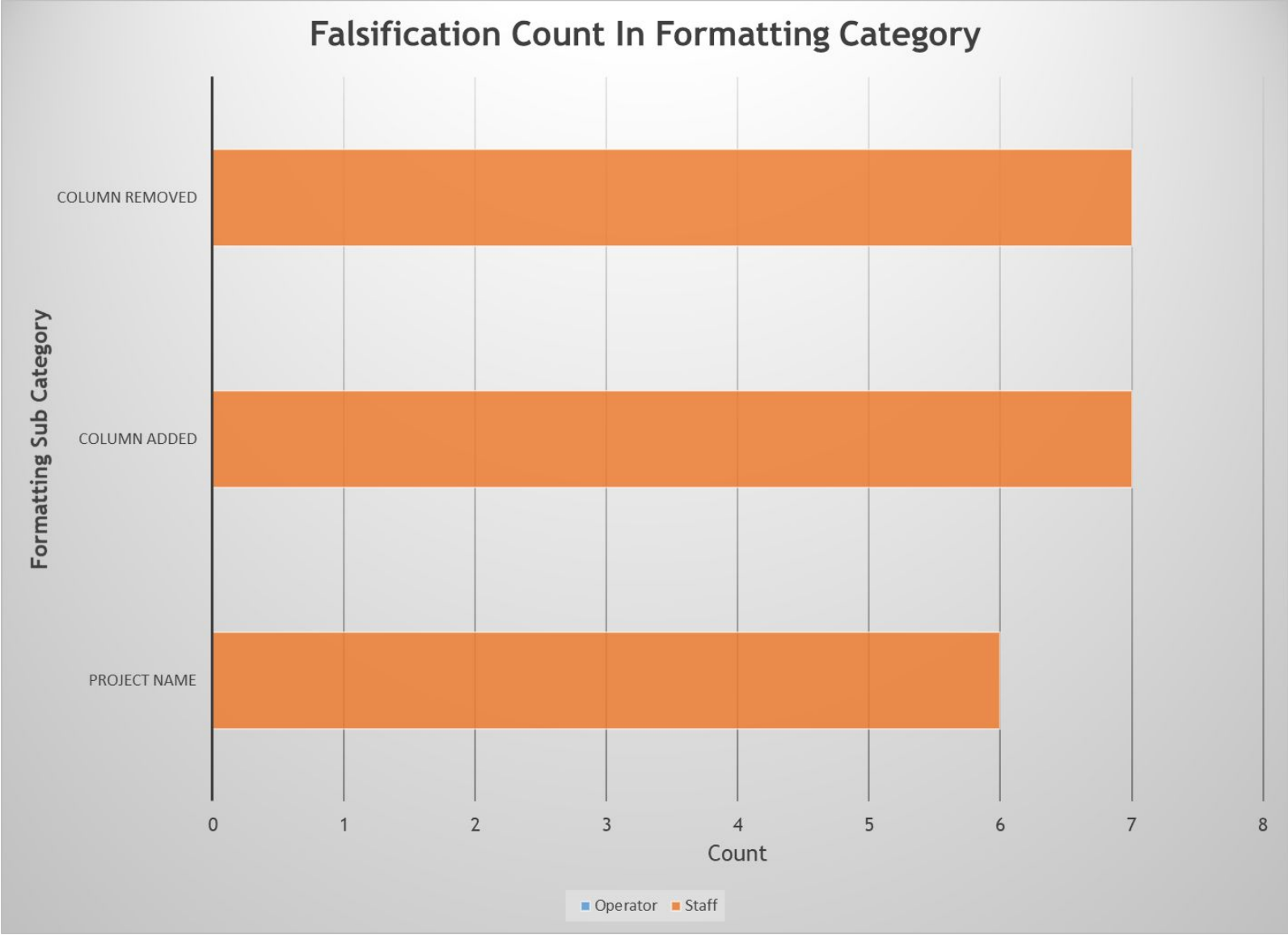
Results of Investigation: Table 915-1



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Results of Investigation: Table 915-1

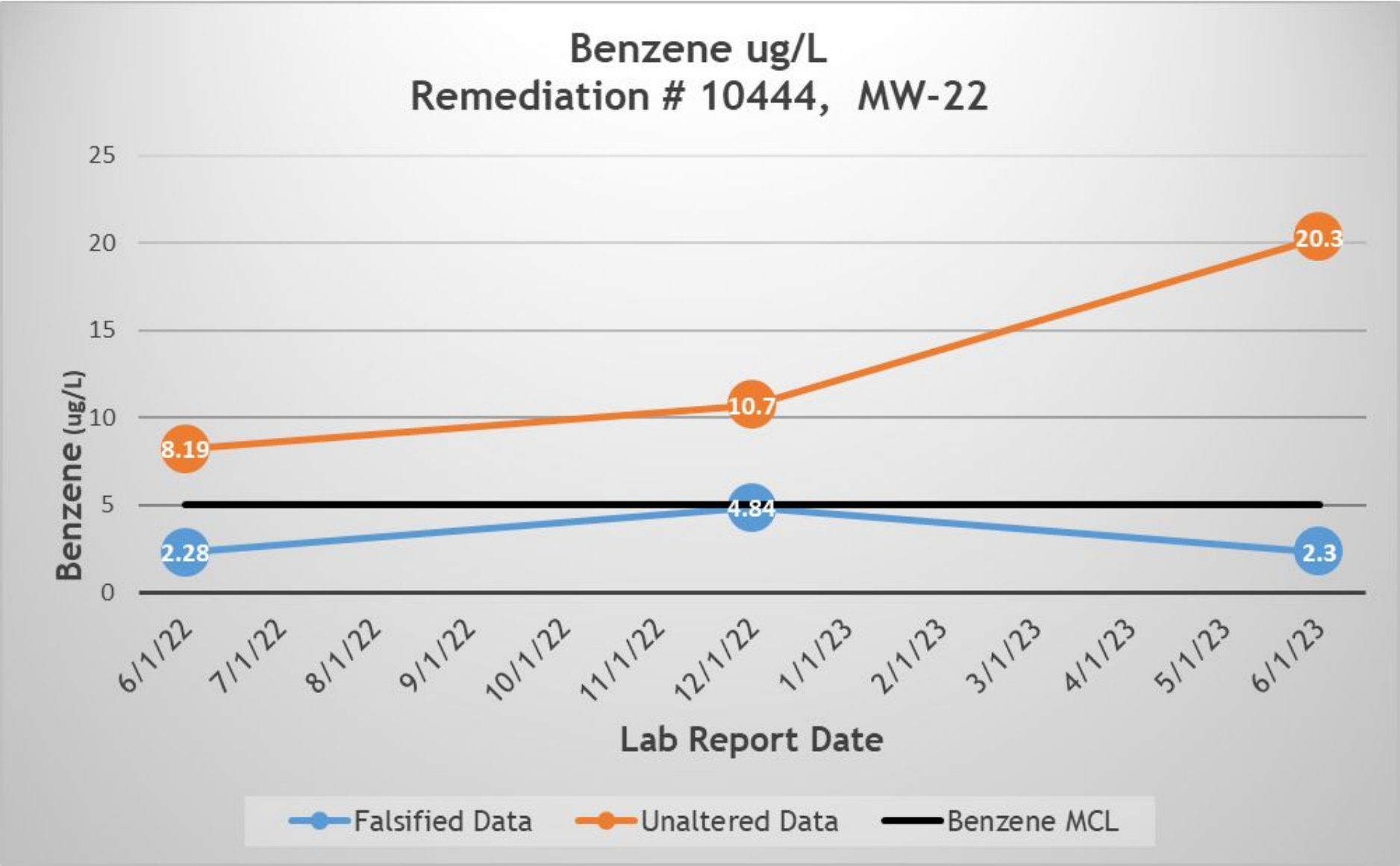


Results of Investigation: example of falsified data per location over time

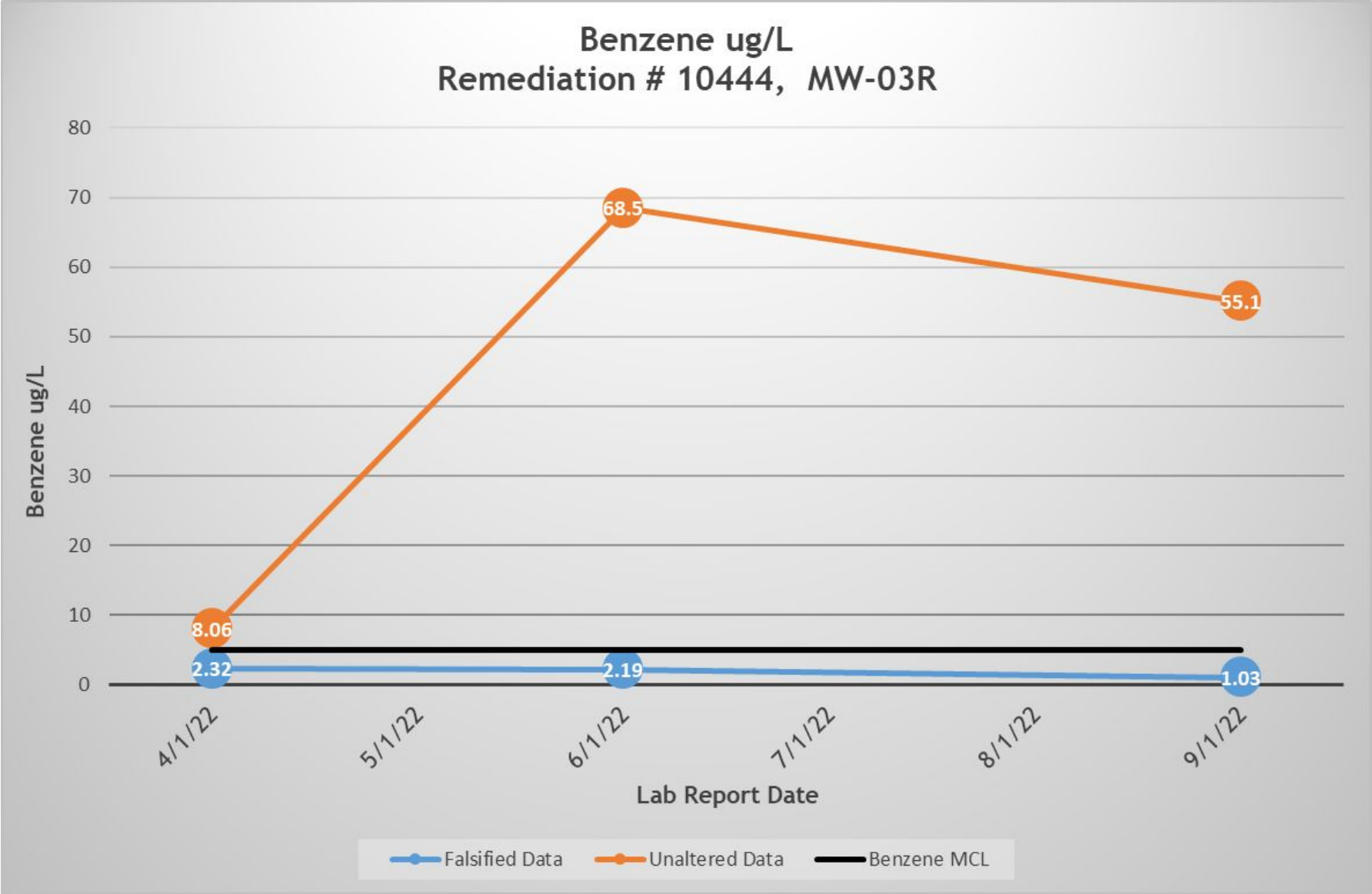
Site_Name	Remediation_num	Operator	Operator_Num	Municipality	Status	start_date	end_date	Latitude	Longitude
HSR Lynch 5-18	10448	Chevron	100322	WELD CO	open	9/1/2017 13:32		40.31707	-104.712826
Date_Lab_Report_Issued	Laboratory_Report_ID	Sample_ID	CAS	Matrix	Analyte	Falsified_Data	Unaltered_Data	units	Data Falsified Type
10/6/21	Y109619	MW-04R	71-43-2	Water	Benzene	3.74	184	ug/L	Target
4/11/22	Y203787	MW-03R	71-43-2	Water	Benzene	2.32	8.06	ug/L	Target
6/16/22	Y206194	MW-03R	71-43-2	Water	Benzene	2.19	68.5	ug/L	Target
6/16/22	Y206194	MW-22	71-43-2	Water	Benzene	2.28	8.19	ug/L	Target
9/22/22	Y209252	MW-03R	71-43-2	Water	Benzene	1.03	55.1	ug/L	Target
9/22/22	Y209252	MW-22	71-43-2	Water	Benzene	1.05	13.9	ug/L	Target
12/28/22	Y212367	MW-22	71-43-2	Water	Benzene	4.84	10.7	ug/L	Target
3/20/23	Y303223	Matrix Spike (B3C0934-MS1)	71-43-2	Water	Benzene	1.54	3.44	ug/L	QC_Spike
3/20/23	Y303223	Matrix Spike Dup (B3C0934-MSD1)	71-43-2	Water	Benzene	12.3	60.5	ug/L	QC_Spike
3/20/23	Y303223	MW-01R	71-43-2	Water	Benzene	2.28	5.1	ug/L	Target
6/27/23	Y306486	MW-22	71-43-2	Water	Benzene	2.3	20.3	ug/L	Target
9/25/23	Y309298	Matrix Spike (B3I1545-MS1)	71-43-2	Water	Benzene	2.98	661	ug/L	QC_Spike
9/25/23	Y309298	Matrix Spike Dup (B3I1545-MSD1)	71-43-2	Water	Benzene	3.71	823	ug/L	QC_Spike
9/25/23	Y309298	MW-01R	71-43-2	Water	Benzene	4.55	1010	ug/L	Target
9/25/23	Y309298	MW-05R	71-43-2	Water	Benzene	1.05	192	ug/L	Target

NOTE: Table 915-1 states that the Maximum Contaminant Limit (MCL) for Benzene is 5 ug/L.

Results of Investigation: Example of falsified data per location over time



Results of Investigation: Example of falsified data per location over time



Results of Investigation: Worst degree of magnitude

Original lab report PDF

Eagle Environmental Consulting, LLC

8000 W 44th Ave

Wheat Ridge CO 80033

Project Number: [none]

Project: Noble - HSR - Lynch 5-18

MW-01R

9/14/2023 1:40:00PM

Analyte	Result	Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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Origins Laboratory, Inc.

Y309298-01 (Water)

BTEX+N+TMBs by 8260D

1,2,4-Trimethylbenzene	10.1	2.00	ug/L	1	B311545	JSM	09/15/2023	09/17/2023	
1,3,5-Trimethylbenzene	8.55	2.00	"	"	"	JSM	"	"	
Benzene	1010	10.0	"	10	"	HKS	"	09/20/2023	
Ethylbenzene	11.1	1.00	"	1	"	JSM	"	09/17/2023	
Naphthalene	ND	2.00	"	"	"	JSM	"	"	U
Toluene	ND	1.00	"	"	"	JSM	"	"	U
Xylenes, total	76.9	1.00	"	"	"	JSM	"	"	
Surrogate: 1,2-Dichloroethane-d4	101 %	70-130			"	"	"	"	
Surrogate: Toluene-d8	104 %	70-130			"	"	"	"	
Surrogate: 4-Bromofluorobenzene	99.4 %	70-130			"	"	"	"	

Submitted lab report PDF

Eagle Environmental Consulting, LLC

8000 W 44th Ave

Wheat Ridge CO 80033

Project Number: [none]

Project: Noble - HSR - Lynch 5-18

MW-01R

9/14/2023 1:40:00PM

Analyte	Result	Limit	Units	Dilution	Batch	Analyst	Prepared	Analyzed	Notes
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Origins Laboratory, Inc.

Y309298-01 (Water)

BTEX+N+TMBs by 8260D

1,2,4-Trimethylbenzene	10.1	2.00	ug/L	1	B311545	JSM	09/15/2023	09/17/2023	
1,3,5-Trimethylbenzene	8.55	2.00	"	"	"	JSM	"	"	
Benzene	4.55	1.00	"	"	"	JSM	"	"	
Ethylbenzene	11.1	1.00	"	"	"	JSM	"	"	
Naphthalene	ND	2.00	"	"	"	JSM	"	"	U
Toluene	ND	1.00	"	"	"	JSM	"	"	U
Xylenes, total	76.9	1.00	"	"	"	JSM	"	"	

Surrogate: 1,2-Dichloroethane-d4

Surrogate: Toluene-d8

Surrogate: 4-Bromofluorobenzene

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Results of Investigation: Worst degree of magnitude

Remediation_number	Laboratory_Rep	Sample_ID	CAS	Matrix	AnaLyte	Falsified_	Unaltered_Data	units	Data Falsified Type
10448	Y309298	MW-01R	71-43-2	Water	Benzene	4.55	1010	ug/L	Target
10448	Y309298	MW-05R	71-43-2	Water	Benzene	1.05	192	ug/L	Target
10448	Y309298	Matrix Spike (B3I1545-MS1	71-43-2	Water	Benzene	2.98	661	ug/L	QC_Spike
10448	Y309298	Matrix Spike Dup (B3I1545	71-43-2	Water	Benzene	3.71	823	ug/L	QC Spike

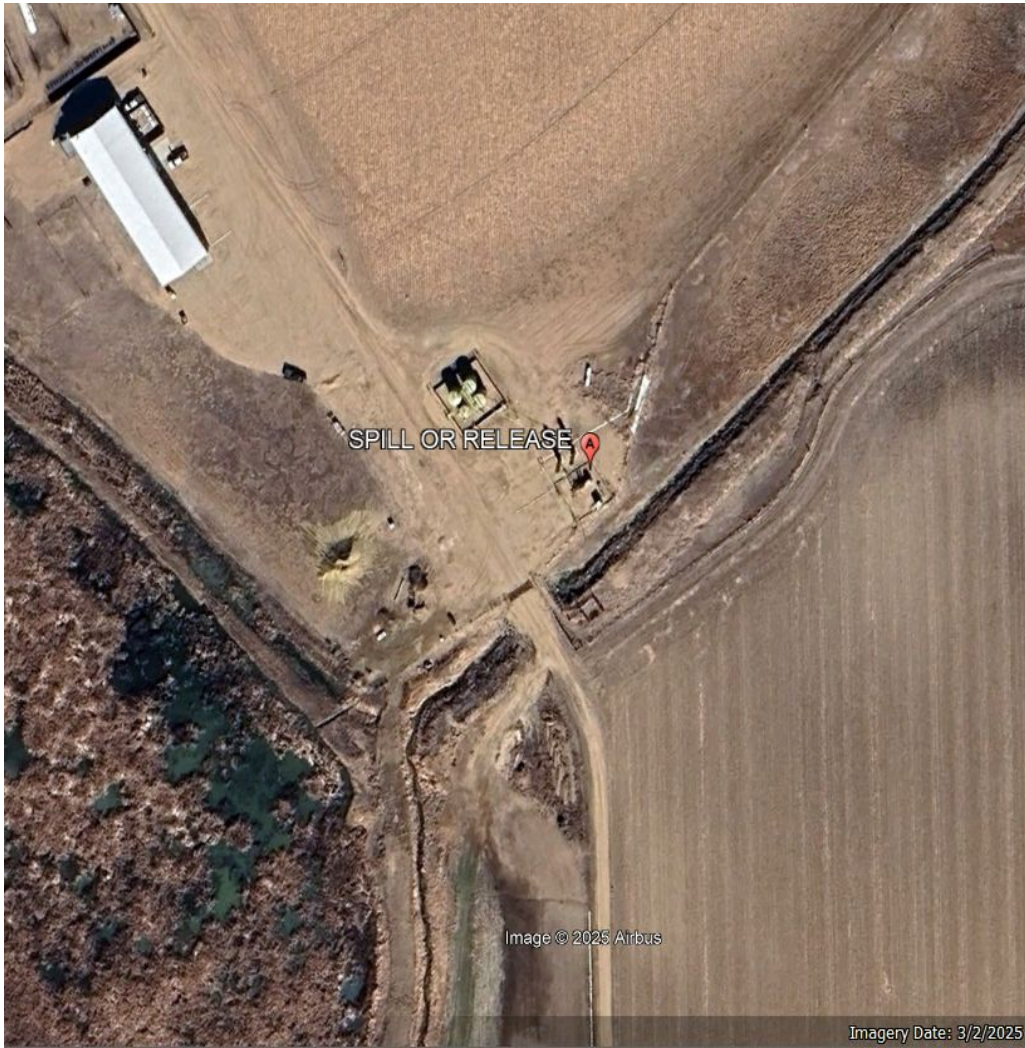
Results of Investigation: Worst degree of magnitude

Sample Location (Latitude/Longitude)	Date	Benzene (µg/L)
ECMC Table 915-1 Regulatory Limits (µg/L)		5

MW-01R (40.317073 / -104.712793)	06/01/18	2160
	08/28/18	799
	12/27/18	1350
	03/27/19	2970
	06/25/19	7380
	09/12/19	10200
	12/27/19	250
	03/03/20	1710
	06/04/20	103
	09/10/20	6110
	12/09/20	2560
	03/09/21	9160
	06/25/21	1030
	09/28/21	7400
	12/27/21	1.28
	03/30/22	<1.00
	06/08/22	<1.00
	09/13/22	<1.00
	12/15/22	<1.00
	03/08/23	2.28
	06/19/23	<1.00
	09/14/23	4.55

TABLE 1
WATER ANALYTICAL RESULTS SUMMARY
HSR-LYNCH #5-18
OIL LINE RELEASE
40.317070 / -104.712826
SW1/4 NW1/4 SEC. 18 T4N R65W 6PM
WELD COUNTY, COLORADO
REMEDATION # 10448

Sample Location (Latitude/Longitude)	Date	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Total Xylenes (µg/L)	Naphthalene (µg/L)	1,2,4- Trimethylbenzene (µg/L)	1,3,5- Trimethylbenzene (µg/L)
ECMC Table 915-1 Regulatory Limits (µg/L)		5	660	700	1400	140	67	67
GW-Q1 (40.317085 / -104.712908)	02/27/18	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	03/11/17	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	06/12/17	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	06/25/17	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	12/26/17	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	06/01/18	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	08/28/18	INA	INA	INA	INA	INA	INA	INA
	12/27/18	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	03/27/19	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	06/25/19	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	12/27/19	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	03/03/20	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	06/04/20	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	09/10/20	<1.00	<1.00	<1.00	<1.00	NA	NA	NA
	12/09/20	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	03/09/21	DRY	DRY	DRY	DRY	DRY	DRY	DRY
	06/25/21	<1.00	<1.00	<1.00	<1.00	<4.00	<1.00	<1.00
	09/28/21	<1.00	<1.00	<1.00	<1.00	<4.00	<1.00	<1.00
	12/27/21	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	03/30/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
GW-Q1 (40.317085 / -104.712908)	06/08/22	<1.00	1.55	<1.00	<1.00	<2.00	<2.00	<2.00
	09/13/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	12/15/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	03/08/23	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	06/19/23	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	09/14/23	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	03/28/17	20800	248000	46800	864000	NA	NA	NA
	08/21/18	2460	8180	231	4110	NA	NA	NA
	03/30/17	NS	NS	NS	NS	NS	NS	NS
	06/12/17	NS	NS	NS	NS	NS	NS	NS
	09/21/17	NS	NS	NS	NS	NS	NS	NS
	12/20/17	NS	NS	NS	NS	NS	NS	NS
	03/21/18	NS	NS	NS	NS	NS	NS	NS
	06/01/18	2160	1800	<200	1980	NA	NA	NA
	08/28/18	799	28.4	22.8	204	NA	NA	NA
	12/27/18	1350	84.4	59.7	337	NA	NA	NA
	03/27/19	2970	551	67.0	390	NA	NA	NA
	06/25/19	7380	<200	<200	236	NA	NA	NA
	09/12/19	10200	<100	234	1340	NA	NA	NA
	12/27/19	250	<50.0	<50.0	<50.0	NA	NA	NA
	03/03/20	1710	<200	<200	<200	NA	NA	NA
	06/04/20	103	<1.00	<1.00	<1.00	NA	NA	NA
	09/10/20	6110	<100	161	1140	NA	NA	NA
	12/09/20	2560	<100	124	742	NA	NA	NA
	03/09/21	9160	164	214	2179	<200	148	158
	06/25/21	1030	30.6	<4.00	80.5	<16.0	8.32	<4.00
	09/28/21	7400	326	204	2240	13.9	188	119
	12/27/21	1.28	<1.00	<1.00	<1.00	<4.00	<1.00	<1.00
	03/30/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	06/08/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	09/13/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	12/15/22	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	03/08/23	2.28	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	06/19/23	<1.00	<1.00	<1.00	<1.00	<2.00	<2.00	<2.00
	09/14/23	4.55	<1.00	11.1	76.9	<2.00	10.1	8.55



Remediation



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Commission**

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ECMC's remediation regulatory authority

PHYSICAL SITE REMEDIATION

- Ensure operator compliance with cleanup per rules and statute.
- Investigate to delineate extent of impact
- Remediate soil/groundwater to Table 915-1

ADMINISTRATIVE REMEDIATION

- Administrative process
- re-open sites as necessary
- show falsified data in each rem file
- obtain new, original, unaltered and secure lab data
- re-establish compliance

Remediation

ECMC remains confident that the falsified data created no new risks to public health because the scope of the impacted data is limited to Site Investigation and Remediation Workplans for sites that had already been disturbed by oil and gas development. In other words, the disturbances from oil and gas operations at these sites is unchanged; the falsified data affects the degree of remediation work needed to remediate those disturbances.

Our Mission

To regulate the development and production of oil and gas, deep geothermal resources, the capture and sequestration of carbon, and the underground storage of natural gas in a manner that protects public health, safety, welfare, the environment and wildlife resources.

Issuance of Seven Notices of Alleged Violation



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Notice of Alleged Violation (NOAV)

Per Rule 523, when the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV).

ECMC issued an NOAV to seven operators

Oxy USA, Inc:

1. Kerr McGee Oil & Gas Onshore, LP (Doc. No. 404289796)

Chevron USA, Inc.:

2. Noble Energy, Inc. (Doc. No. 404289853)

Civitas Resources, Inc.:

3. 8 North, LLC (Doc No. 404289874),
4. Bonanza Creek Energy Operating Company, LLC (Doc. No. 404289898),
5. Crestone Peak Resources Operating, LLC (Doc. No. 404289950),
6. Extraction Oil & Gas, Inc. (Doc. No. 404289966),
7. Highpoint Operating Corporation (Doc. No. 404289999)

ECMC issued an NOAV to seven operators

1. Violations:
 - a. Rule 207 (Accurate and complete reports)
 - b. Rule 602 (Training and supervision of contractors)
2. Corrective Actions require operators submit a prioritized plan to comply with remediation direction provided by Staff.

NOAVs are publicly available online:
ecmc.colorado.gov/data-maps-reports/special-projects

NOAV Process Next Steps

1. Per Rule 523, each operator has 28 days to file an Answer, responding to the alleged violations.
2. Thereafter, Enforcement Staff and the Attorney General's Office will commence the enforcement actions, filing applications for a hearing with the Hearings Unit.
3. ECMC expects the NOAVs will take time to resolve.

This a legal enforcement action. Therefore, no other information will be shared during the process, outside of what occurs in the eFiling System or at public hearings.

Corrective Action Next Steps

1. Each operator submits a plan by August 19, 2025, to address the Corrective Actions outlined in the NOAVs.
2. Operators will submit a Form 27 for each of the 404 locations to comply with direction provided by Staff.

ECMC's Scope of Jurisdiction

- ECMC's enforcement jurisdiction is established by the Colorado Oil and Gas Conservation Act.
- ECMC's investigation did not and does not include determining why the data falsification occurred, as that would fall outside the scope of ECMC's jurisdiction.
- ECMC referred this matter to criminal prosecutors for further review, assessment, and investigation.

Quality Assurance



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Quality Assurance/Quality Control Unit

- The QA/QC unit was formed to pursue continuous improvement at ECMC
- QA/QC is charged with improving integrity of ECMC processes
- QA/QC is charged with auditing information being collected
- One of QA/QC main objectives is to identify defects and work to remedy those defects
- We will work diligently to remedy the current situation and work towards measures to prevent future occurrences

Data Integrity and Quality Assurance

1. In late 2024, ECMC put in place additional safeguards to prevent falsified data from being submitted
 - Staff began examining metadata for certain indicators of potential falsification
 - Staff began requiring lab reports to be stand-alone attachments (not combined PDFs)
2. In April 2025, ECMC formalized the requirement for secured lab reports to ensure authenticity
 - Digital certification
 - Password secured
 - Included Forms 27 In Process

Data Integrity and Quality Assurance

Continued Investigation:

- COGIS contains tens of thousands of previously submitted laboratory analytical reports
 - Need to demonstrate data integrity across all projects
- ECMC has contracted with a forensic investigation firm to determine if there is a way to electronically review analytical data previously submitted.
 - This process determines if data submitted in a pdf has been manipulated
 - Initial results are encouraging
 - We are in the second phase of testing to narrow down data that has been manipulated
 - By the end of September phase three will be completed with a random testing of 200 documents
 - ECMC will then evaluate for further document testing

Questions?



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