

1801 Broadway, Suite 450
Denver, CO 80202

March 25, 2016

Colorado Department of Public Health & Environment
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, Colorado 80246

RE: Gilbert-Stewart Operating, LLC ; 2015 Annual Leak Detection and Repair (LDAR) Report

Ladies/Gentlemen:

Gilbert-Stewart Operating, LLC is submitting the LDAR Annual Report Form as required by Colorado Regulation 7, Section XVII.F.9. In 2015, the three (3) facilities listed below, consisting of 100% of Gilbert-Stewart Operating's Colorado oil and gas operations were inspected using an Approved Instrument Monitoring Method (AIMM). The Yeltsin Facility contains equipment for the Yeltsin #1 well and Akers #2 well. The AIMM inspection for the equipment associated with the Yeltsin #1 well was completed. However, the Akers #2 well has been shut-in and the associated equipment has not yet been inspected. Should the Akers #2 well begin producing, the other half of the Yeltsin Facility will be monitored.

- Perot Tank Battery
- Yeltsin Facility (Yeltsin #1 and Akers #2 wells)
- Republican Tank Battery

Uncontrolled volatile organic compound (VOC) emissions from the condensate storage tanks for each facility are less than six tons per year (6 TPY) and were installed prior to October 15, 2014. Therefore, these facilities are subject to the one-time AIMM inspections to be completed before January 1, 2016 (Regulation 7, XVII.F.4). Monthly Audio, Visual, Olfactory (AVO) inspections were not required to begin until January 1, 2016 and are not included in the 2015 Annual LDAR Report.

Should you have any questions or need additional information, you may contact me at (303) 534-1686 or Lesair Environmental at (303) 904-2525.

Sincerely,



Kent Gilbert
Managing Partner

Leak Detection and Repair (LDAR) Annual Report Form¹



Please submit via email to: cdphe_reg7LDAR_annualreports@state.co.us

Section 1: General Information

Company Name:	Gilbert-Stewart Operating, LLC		
Inspection Year:	2015	# Facilities Inspected: ²	3
Contact Person:	Kent Gilbert	Title:	Managing Partner
Phone Number:	303-534-1686	E-mail Address:	kgoil@msn.com

Section 2: LDAR Inspections

Inspection Method	# Inspections ³
AIMM at Natural Gas Compressor Stations:	0
AIMM at Well Production Facilities:	3
AVO at Well Production Facilities:	0
TOTAL	3

Section 3: Leaking Components Details

Component Type	# Leaks Identified ⁴	# Leaks Repaired	# Leaks on Delay of Repair List as of Dec 31
Valves:	0		
Connectors:	0		
Flanges:	0		
Pump Seals:	0		
Pressure Relief Devices:	0		
TOTAL	0	0	0

Section 4: Responsible Official Certification

All information contained in the LDAR Annual Report must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section 1.B.38.

Please note the Colorado Statutes state that any person who knowingly, as defined in §18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of §25-7 122.1, C.R.S.

I, the Responsible Official, have reviewed this annual report in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this report are true, accurate and complete.

Printed/Typed Name - Responsible Official:	Title:
Kent Gilbert	Managing Partner
Signature:	Date:
	3-29-16

