

State of Colorado
Oil and Gas Conservation Commission

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Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
402156579
Date Issued:
08/27/2019
Date Resolved:

NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 522, 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). Per Rule 523, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

OPERATOR INFORMATION

OGCC Operator Number: <u>10633</u>	Contact Name and Telephone:
Name of Operator: <u>CRESTONE PEAK RESOURCES OPERATING LLC</u>	Name: <u>DAVID STEWART</u>
Address: <u>1801 CALIFORNIA STREET #2500</u>	Phone: <u>(303) 774-3909</u> Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>david.stewart@crestonepr.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-123-19555-00 Facility or Location ID: _____
Name: ELMQUIST Number: 11-23
QtrQtr: NWNW Sec: 23 Twp: 2N Range: 68W Meridian: 6
County: WELD

ALLEGED VIOLATION

Rule: 34-60-121(1) CRS-b
Rule Description: Statutory Violation - Permit Violation
Initial Discovery Date: _____ Was this violation self-reported by the operator? No
Date of Violation: _____ Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? No

Description of Alleged Violation:

COGCC granted approval for Operator to plug the subject Well, subject to COGCC Conditions of Approval ("COA") in Operator's Notice of Intent to Abandon ("Form 6-N"). Pursuant to Form 6-N COA, Operator was required to follow certain procedures to mitigate potential risk from bradenhead pressure and/or fluid migration.

Form 6-N No. 401805978

Requirement: If there is any pressure/fluid on the surface casing during the pre-plugging bradenhead test ("BHT"), Operator must wait 8 hrs after pumping plug at 2200 feet and check for fluid migration or shut-in pressure on the well. Contact COGCC Engineer for revised plugging orders if well is not static at this time prior to continuing with plugging operations.

Pre-plugging BHT Form 17 No. 401817734
Surface casing pressure 6 psi

Form 6-S No. 401904542
Violation: Failed to wait required interval between plugs; Failed to do required pressure / fluid migration check

Other documentation supporting violation allegation:
Document No. 401905392
Document type: Form 6-S attachment: wireline summary with Swabco ticket

How it supports: Swabco ticket from 12/07/2018 shows morning 50 psi on the S. Casing. Casing was pulled and well circulated followed immediately by pumping stub plug and then shoe plug. Ops summary, however, contradicts this and reports no pressure that morning. Operator cannot explain the discrepancy.

Document No. 2304741
Document type: Form 6-S attachment: Ops/rig summary
How it supports: (see wireline summary note above)

Operator failed to follow the specified pressure/fluid migration mitigation procedures, violating the Form 6-N permit COA and § 34-60-121.(1)(a), C.R.S.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 09/26/2019

Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.

In its Rule 522.d.(2) Answer, due within 28 days of the Operator's receipt of the NOAV, Operator shall include a compliance plan detailing an internal procedure to ensure future compliance with all terms of approved Form 6-Ns, including compliance with any approved amendments to the procedures or details in the Form 6-N.

Rule: 34-60-121(1) CRS-b

Rule Description: Statutory Violation - Permit Violation

Initial Discovery Date: _____ Was this violation self-reported by the operator? No

Date of Violation: _____ Approximate Time of Violation: _____

Was this a discrete violation of obvious duration? No

Description of Alleged Violation:

COGCC granted approval for Operator to plug the subject Well, subject to COGCC Conditions of Approval ("COA") in Operator's Notice of Intent to Abandon ("Form 6-N"). Pursuant to Form 6-N COA, Operator was required to submit certain documentation with the Subsequent Report of Abandonment ("Form 6-S").

Form 6-N No. 401805978
Requirement: Submit gyro of 5/24/11 with Form 6 SRA

Form 6-S No. 401904542
Form 6-S submitted: 01/15/2019
COGCC requested missing documentation from Operator: 04/22/2019
Missing documentation received by COGCC: 06/28/2019

Operator failed to submit required documentation with the Form 6-S, violating the Form 6-N permit COA and § 34-60-121.(1)(a), C.R.S.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 09/26/2019

Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.

In its Rule 522.d.(2) Answer, due within 28 days of the Operator's receipt of the NOAV, Operator shall include a compliance plan detailing an internal procedure to ensure future compliance with all terms of approved Form 6-Ns, including compliance with any approved amendments to the procedures or details in the Form 6-N.

PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 523, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

ANSWER

Pursuant to Rule 522.d.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgement may be entered. Hard copy answers are filed with the Commission Secretary at the Commission's Denver office and should also be emailed to dnr_cogccenforcement@state.co.us.

NOAV ISSUED

NOAV Issue Date: <u>08/27/2019</u>	
COGCC Representative Signature: _____	
COGCC Representative: <u>Kira Gillette</u>	Title: <u>NOAV Specialist</u>
Email: <u>kira.gillette@state.co.us</u>	Phone Num: <u>(303) EMAIL</u>

CORRECTIVE ACTION COMPLETED

Rule: 34-60-121(1) <u>CRS-b</u>	
Rule Description: <u>Statutory Violation - Permit Violation</u>	
Corrective Action Start Date: _____	Corrective Action Complete Date: _____
Has corrective action for this violation been performed as required? _____	
Description of Actual Corrective Action Performed by Operator _____	
Rule: 34-60-121(1) <u>CRS-b</u>	
Rule Description: <u>Statutory Violation - Permit Violation</u>	
Corrective Action Start Date: _____	Corrective Action Complete Date: _____
Has corrective action for this violation been performed as required? _____	
Description of Actual Corrective Action Performed by Operator _____	

FINAL RESOLUTION

Cause #: _____	Order #: _____	Docket #: _____
Enforcement Action: _____	Final Resolution Date: _____	
Final Resolution Comments: _____		

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number	Description
402156657	NOAV COVER LETTER
402156658	NOAV CERTIFIED MAIL RECEIPT
402156735	NOAV ISSUED

Total Attach: 3 Files