

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

401027413

Date Issued:

04/15/2016

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: 96735

Name of Operator: WILLIFORD RESOURCES, L.L.C.

Address: 6506 S LEWIS AVE STE 102

City: TULSA State: OK Zip: 74136

Contact Name and Telephone:

Name: Linda Callahan

Phone: (918) 712-8828 Fax: ()

Email: lcallahan3@swbell.net

Additional Operator Contacts

Email

Glenn Stevens

glennstevens@centurylink.net

Hearne Williford

hwilli@swbell.net

Well Location, or Facility Information (if applicable):

API Number: 05-067-05446-00

Facility or Location ID:

Name: DYE-HARD

Number: 1

QtrQtr: NWNW

Sec: 13

Twp: 33N

Range: 12W

Meridian: N

County: LA PLATA

ALLEGED VIOLATION

Rule: 912.b

Rule Description: Venting or Flaring Natural Gas - Notice and Prior Approval Required

Initial Discovery Date: 03/17/2016

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:

Pursuant to Rule 912.b., except for gas flared or vented during an upset condition, well maintenance, well stimulation flowback, purging operations, or a productivity test, gas from a well shall be flared or vented only after notice has been given and approval obtained from the Director on a Form 4 - Sundry Notice stating the estimated volume and content of the gas. While investigating an odor complaint (Document #200439222) during a March 17, 2016 inspection of Dye-Hard #1 (API 05-067-05446) (Document #685200082), COGCC staff observed that the well was venting gas from the production casing. The Dye-Hard #1 was unattended at the start of the inspection, but a pumper and Operator's representative arrived shortly thereafter. COGCC staff observed and documented a gas plume with an Optical Imaging Camera (Document # 685200083) and the company representative that prior approval to vent is a requirement under Rule 912.b. At this time, the pumper shut the casing valve and deactivated the pumping unit. After further investigation of COGCC records, COGCC could find no Form 4 - Sundry Notice submission from Operator requesting approval to vent gas at Dye-Hard #1, violating Rule 912.b.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 05/16/2016

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

Operator shall maintain shut in status for the Dye-Hard #1 and cease venting gas from the production casing of all wells, and associated lines, valves and open ended regulators which are not connected to supply lines or equipment. Operator shall immediately cease any and all venting being conducted at any of its facilities in the State without approved Form 4 - Sundry Notices. Operator shall also timely submit Form 4 - Sundry Notice flaring requests and notify the LGD or emergency dispatch prior to, or within 2 hours of, any future flaring of gas at any of its facilities in the State. Within thirty (30) days of the issuance of this NOAV, Operator

shall submit a written explanation describing how its procedures will be changed to prevent future Rule 912.b. violations.

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_cogccenforecment@state.co.us.

NOAV ISSUED

NOAV Issue Date: 04/15/2016

COGCC Representative Signature: Steven Mah for Mark Weems

COGCC Representative: Mark Weems

Title: Southwest Region Engineer

Email: mark.weems@state.co.us

Phone Num: (970) 259-4587x

ATTACHMENT LIST

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

| <u>Document Number</u> | <u>Description</u> |
|------------------------|-----------------------------|
| 401029885 | NOAV COVER LETTER |
| 401029887 | NOAV CERTIFIED MAIL RECEIPT |

Total Attach: 2 Files