

State of Colorado
Oil and Gas Conservation Commission

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Date Issued:
04/15/2016
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>96735</u>	Contact Name and Telephone:
Name of Operator: <u>WILLIFORD RESOURCES, L.L.C.</u>	Name: <u>Linda Callahan</u>
Address: <u>6506 S LEWIS AVE STE 102</u>	Phone: <u>(918) 712-8828</u> Fax: <u>()</u>
City: <u>TULSA</u> State: <u>OK</u> Zip: <u>74136</u>	Email: <u>lcallahan3@swbell.net</u>

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_cogccenforcement@state.co.us.

NOAV ISSUED

NOAV Issue Date: 04/15/2016

COGCC Representative Signature: _____

COGCC Representative: Mark Weems

Title: Southwest Region Engineer

Email: mark.weems@state.co.us

Phone Num: (970) 259-4587x

CORRECTIVE ACTION COMPLETED

Rule: 912.b

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

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.

<u>Document Number</u>	<u>Description</u>
401029885	NOAV COVER LETTER
401029887	NOAV CERTIFIED MAIL RECEIPT
401029926	NOAV ISSUED

Total Attach: 3 Files