

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401082880  
Date Issued:  
08/09/2016  
Date Resolved:  
04/12/2017

**NOTICE OF ALLEGED VIOLATION - RESOLVED**

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: 10407  
Name of Operator: ANTLER ENERGY LLC  
Address: PO BOX 104  
City: BAGGS State: WY Zip: 82321  
Contact Name and Telephone:  
Name: Clay Evans  
Phone: (307) 380-7617 Fax: ( )  
Email: clayjevans@yahoo.com

**Well Location, or Facility Information (if applicable):**

API Number: 05-081-07455-00 Facility or Location ID: \_\_\_\_\_  
Name: MOFFAT COUNTY Number: 1-8  
QtrQtr: SWSE Sec: 8 Twp: 9N Range: 94W Meridian: 6  
County: MOFFAT

**ALLEGED VIOLATION**

Rule: 326.b  
Rule Description: Shut-in Wells  
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:**

Pursuant to Rules 326.b.(1) and (2), Antler Energy LLC (Operator) is required to perform a mechanical integrity test (MIT) on shut in (SI) wells within two (2) years of the initial shut in date and then at five (5) year intervals after an initial successful MIT. Based on Operator's Form 7 Monthly Reports of Operations stating the Moffat County #1-8, API 081-07455, (Well) was SI December 2012 and returned to production in September 2015, as noted in Operator's April 28, 2016 response, Document #2193318, without first conducting an MIT. COGCC staff has reason to believe the Well is past due for performance of an MIT. Warning Letter #2193057 was issued to Operator on December 3, 2015 and required corrective action to resolve the delinquent MIT by April 30, 2016. To date Operator has not conducted an MIT for the Well, violating Rules 326.b.(1) and (2).

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 04/30/2016

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

Operator shall contact the area engineer, Dave Andrews, and negotiate a compliance plan to resolve this issue.

## 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](mailto:dnr_cogccenforcement@state.co.us).

## NOAV ISSUED

NOAV Issue Date: 08/09/2016

COGCC Representative Signature: \_\_\_\_\_

COGCC Representative: Andrew Stone

Title: Engineering Tech

Email: andrewg.stone@state.co.us

Phone Num: (303) 894-2100x5188

## CORRECTIVE ACTION COMPLETED

Rule: 326.b

Rule Description: Shut-in Wells

Corrective Action Start Date: \_\_\_\_\_

Corrective Action Complete Date: \_\_\_\_\_

Has corrective action for this violation been performed as required? Yes

Description of Actual Corrective Action Performed by Operator

August 10, 2016, Anter negotiated a compliance plan to resolve this issue.

## FINAL RESOLUTION

Cause #: 1V

Order #: 624

Docket #: 161000388

Enforcement Action: Administrative Order of Consent

Final Resolution Date: 02/01/2017

Final Resolution Comments:

Resolved by Order 1V-624.

## 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>
401082880	NOAV APPROVED
401090954	NOAV COVER LETTER
401091147	NOAV ISSUED
401091151	NOAV CERTIFIED MAIL RECEIPT
401091153	NOAV IN PROCESS
401111887	NOAV OPERATOR ANSWER
401145630	NOAV CERTIFIED MAIL RETURN RECEIPT

Total Attach: 7 Files