

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401202313  
Date Issued:  
02/09/2017  
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: 100322  
Name of Operator: NOBLE ENERGY INC  
Address: 1625 BROADWAY STE 2200  
City: DENVER State: CO Zip: 80202  
Contact Name and Telephone:  
Name: Scott Park  
Phone: (970) 304-5273 Fax: ( )  
Email: scott.park@nblenergy.com

Well Location, or Facility Information (if applicable):

API Number: 05-123-13434-00 Facility or Location ID:  
Name: LILLI UNIT Number: 14-5  
QtrQtr: SESW Sec: 5 Twp: 8N Range: 58W Meridian: 6  
County: WELD

ALLEGED VIOLATION

Rule: 316B  
Rule Description: Mechanical Integrity Test  
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 Rule 316B., Operator is required to submit a Mechanical Integrity Test Form 21 within 30 days of the test. Noble Energy Inc. (Operator) conducted a mechanical integrity test (MIT) on the Lilli Unit #14-5 well, API 123-13434, (Well) on July 27, 2016 (Document #684901826), and a Form 21 should have been submitted by August 26, 2016. To date, no Form 21 has been submitted, violating Rule 316B.

Abatement or Corrective Action Required to be Performed by Operator: Corrective Action Due Date: 03/13/2017

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

Operator shall submit a Form 21 for the MIT conducted July 27, 2016 by March 13, 2017. In Operator's NOAV Answer, due 28 days after Operator's receipt of this NOAV pursuant to Rule 522.d.(2)., Operator shall submit a written plan that explains how MIT's will timely be completed and reported in the future.

Rule: 326.a  
Rule Description: Injection 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 Rule 326.a.(4)A., dedicated injection wells must have mechanical integrity tests (MIT) conducted not less than every five years, or more frequently as required by Rule 326.a.(4)C. Noble Energy Inc. (Operator) conducted an MIT on the Lilli Unit #14-5 well,

API 123-13434, (Well) on June 21, 2011 (Document #2001160). Operator was due to conduct the next MIT on the Well by June 21, 2016, but the MIT was not conducted on the Well until July 27, 2016, as observed by COGCC staff (Document #684901826), violating Rule 326.a(4)A.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 03/13/2017

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

In Operator's NOAV Answer, due 28 days after Operator's receipt of this NOAV pursuant to Rule 522.d.(2)., Operator shall submit a written plan that explains how MIT's will timely be conducted in the future.

### 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: 02/09/2017

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

COGCC Representative: Bob Koehler Title: Underground Injection Con

Email: bob.koehler@state.co.us Phone Num: (303) 894-2100x5147

### CORRECTIVE ACTION COMPLETED

Rule: 316B

Rule Description: Mechanical Integrity Test

Corrective Action Start Date: \_\_\_\_\_ Corrective Action Complete Date: 02/24/2017

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

Description of Actual Corrective Action Performed by Operator

A Form 21 for the July 27, 2016 MIT was submitted on February 24, 2017 (Document #401218123).

Rule: 326.a

Rule Description: Injection Wells

Corrective Action Start Date: \_\_\_\_\_ Corrective Action Complete Date: 07/27/2016

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

Description of Actual Corrective Action Performed by Operator

The well was MIT'd on July 27, 2016.

### FINAL RESOLUTION

Cause #: 1V Order #: 639 Docket #: 170700186

Enforcement Action: Administrative Order of Consent Final Resolution Date: 07/24/2017

Final Resolution Comments:

Resolved by Order 1V-639.

### 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>
401206733	NOAV COVER LETTER
401206735	NOAV CERTIFIED MAIL RECEIPT
401206950	NOAV ISSUED
401208058	NOAV IN PROCESS
401212250	NOAV CERTIFIED MAIL RETURN RECEIPT
401213571	NOAV RESPONSE CORRESPONDENCE
401234700	NOAV OPERATOR ANSWER

Total Attach: 7 Files