

State of Colorado  
Oil and Gas Conservation Commission

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Date Issued:  
07/24/2018  
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>100322</u>	Contact Name and Telephone:
Name of Operator: <u>NOBLE ENERGY INC</u>	Name: <u>Jan Kulmann</u>
Address: <u>1001 NOBLE ENERGY WAY</u>	Phone: <u>(720) 587-2453</u> Fax: <u>( )</u>
City: <u>HOUSTON</u> State: <u>TX</u> Zip: <u>77070</u>	Email: <u>jan.kulmann@nblenergy.com</u>

Additional Operator Contacts	Email
RJ Moses	RJ.Moses@nblenergy.com

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

API Number: 05-123-10836-00 Facility or Location ID: \_\_\_\_\_  
 Name: ECKHARDT Number: 1  
 QtrQtr: SESE Sec: 33 Twp: 5N Range: 64W Meridian: 6  
 County: WELD

**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 Rule 326.b., Noble Energy Inc ("Noble") is required to perform a Mechanical Integrity Test ("MIT") on Shut-in ("SI") wells within two (2) years of the initial shut-in date.

Noble disclosed to COGCC that the Eckhardt (API No. 05-123-10836, "Well") was SI on November 1, 2015.

Noble reported that the Well failed an MIT on February 6, 2018 (Document No. 401558158); the MIT was approximately 98 days late.

Operator failed to conduct an MIT for the Well within two years of the initial shut-in date, in violation of Rule 326.b.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 08/07/2018

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

Within 14 calendar days of NOAV issuance, Noble shall submit an eForm 27, Site Investigation and Remediation Workplan, for Staff

approval, describing a site-specific plan to investigate whether an impact to public health, safety, welfare, including the environment and wildlife resources, has occurred. Any existing information in Noble's possession regarding environmental analysis or impacts (including samples taken during bradenhead testing or plugging of the Well) shall be submitted with the eForm 27.

Rule: 326.f

Rule Description: All Wells Shall Maintain Mechanical Integrity

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.f., all wells shall maintain mechanical integrity, and Noble Energy Inc ("Noble") shall repair or plug and abandon ("P&A"), within six months, any non-injection well which lacks mechanical integrity, as determined through a mechanical integrity test or other means.

Noble disclosed to COGCC Bradenhead Survey information for the Eckhardt (API No. 05-123-10836, "Well") indicating that the Well had Bradenhead pressures between 4 and 34 psi going back to spring of 2015. Noble reported that the Well failed an MIT on February 6, 2018 (Document No. 401558158). A failed MIT demonstrates a lack of mechanical integrity, in violation of Rule 326.f.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 08/07/2018

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

Within 14 calendar days of NOAV issuance, Noble shall submit an eForm 27, Site Investigation and Remediation Workplan, for Staff approval, describing a site-specific plan to investigate whether an impact to public health, safety, welfare, including the environment and wildlife resources, has occurred. Any existing information in Noble's possession regarding environmental analysis or impacts (including samples taken during bradenhead testing or plugging of the Well) shall be submitted with the eForm 27.

### 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: 07/24/2018

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

COGCC Representative: Kira Gillette Title: NOAV Specialist

Email: kira.gillette@state.co.us Phone Num: (303) 894-2100x5165

### 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? No

Description of Actual Corrective Action Performed by Operator

NOAV resolved by Order 1V-668. See Order for details regarding corrective actions performed or pending.

Rule: 326.f

Rule Description: All Wells Shall Maintain Mechanical Integrity

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

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

Has corrective action for this violation been performed as required? No

Description of Actual Corrective Action Performed by Operator

NOAV resolved by Order 1V-668. See Order for details regarding corrective actions performed or pending.

### FINAL RESOLUTION

Cause #: 1V Order #: 668 Docket #: 180900672

Enforcement Action: Administrative Order of Consent

Final Resolution Date: 09/17/2018

Final Resolution Comments:

NOAV resolved by Order 1V-668.

### ATTACHMENT LIST

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

<b>Document Number</b>	<b>Description</b>
401712274	NOAV COVER LETTER
401712275	NOAV CERTIFIED MAIL RECEIPT
401712340	NOAV ISSUED
401712406	NOAV IN PROCESS
401721929	NOAV CERTIFIED MAIL RETURN RECEIPT

Total Attach: 5 Files