

State of Colorado
Oil and Gas Conservation Commission

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07/24/2018
Date Resolved:
11/27/2018

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: 100322

Name of Operator: NOBLE ENERGY INC

Address: 1001 NOBLE ENERGY WAY

City: HOUSTON State: TX Zip: 77070

Contact Name and Telephone:

Name: Jan Kulmann

Phone: (720) 587-2453 Fax: ()

Email: jan.kulmann@nblenergy.com

Additional Operator Contacts

Email

RJ Moses

RJ.Moses@nblenergy.com

Well Location, or Facility Information (if applicable):

API Number: 05-123-22350-00

Facility or Location ID:

Name: FRANK

Number: 22-34

QtrQtr: SESW

Sec: 22

Twp: 3N

Range: 65W

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 Frank 22-34 (API No. 05-123-22350, "Well") was SI on December 1, 2015.

Noble reported that the Well failed an MIT on February 15, 2018 (Document No. 401571798); the MIT was approximately 77 days late.

Noble 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 Frank 22-34 (API No. 05-123-22350, "Well") indicating that the Well had bradenhead pressures between 116 and 200 psi going back to spring of 2016. Noble reported that the Well failed an MIT on February 15, 2018 (Document No. 401571798). Noble reported that the Well was P&A-ed on February 22, 2018 (Document No. 401611521). 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.

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.

<u>Document Number</u>	<u>Description</u>
401711123	NOAV RESOLVED
401712199	NOAV CERTIFIED MAIL RECEIPT
401712201	NOAV COVER LETTER
401712356	NOAV ISSUED
401715496	NOAV IN PROCESS
401721933	NOAV CERTIFIED MAIL RETURN RECEIPT
401851372	NOAV APPROVED

Total Attach: 7 Files