

State of Colorado  
Oil and Gas Conservation Commission

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**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: 1001 NOBLE ENERGY WAY  
City: HOUSTON State: TX Zip: 77070

Contact Name and Telephone:  
Name: CRAIG RICHARDSON  
Phone: (303) 228-4232 Fax: ( )  
Email: craig.richardson@nblenergy.com

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

API Number: 05- - -00 Facility or Location ID: 305921  
Name: KREYKES-66N67W Number: 13NENE  
QtrQtr: NENE Sec: 13 Twp: 6N Range: 67W Meridian: 6  
County: WELD

**ALLEGED VIOLATION**

Rule: 606A.h  
Rule Description: Fire Prevention and Protection- ignition sources at safe distance

Initial Discovery Date: \_\_\_\_\_ Was this violation self-reported by the operator? Yes  
Date of Violation: \_\_\_\_\_ Approximate Time of Violation: \_\_\_\_\_  
Was this a discrete violation of obvious duration? Yes

Description of Alleged Violation:

Pursuant to Rule 606A.h., Noble Energy Inc ("Operator") shall allow open fires, transformers, or other sources of ignition only in designated areas located at a safe distance from the wellhead or flammable liquid storage areas.

On November 15, 2018, Operator reported an accidental fire at the Kreykes #13-11 (API No. 05-123-23683, "Well"). On November 13, 2018, Operator's service contractor attempted to kill the Well by trying to pump fluids down it. Those efforts were unsuccessful. The contractor then attempted to blow the Well down to an open top tank using a choke manifold system. This process released hydrocarbon vapors from this open top tank system. The fluid to fluid air gap was not grounded, and the fluid flow accumulated static electric charge until the charged fluid column discharged at the nearest ground, causing ignition and igniting the hydrocarbons in the open top tank. (Accident Report Form 22 Nos. 401841303, initial; and 401906871, subsequent).

This ignition led to a fire in the open top tank, which spread to the neighboring work tank. COGCC Staff conducted an inspection of the facility later that day, and observed some grounding equipment associated with the tank/gas buster system, however COGCC Staff has concerns about the efficacy of the equipment. (Field Inspection Report No. 694400056).

Response from the local fire department was required to extinguish the fire. (Subsequent Accident Report Form 22 No. 401906871)

Operator flowed hydrocarbons at a high rate without adequate grounding, creating a potential ignition source within an unsafe proximity to flammable liquid storage open top tank, violating Rule 606A.h.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 07/08/2019

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

Operator shall provide COGCC with documentation that Operator has implemented the recommendations submitted in Accident Report Document No. 401906871.

Operator shall submit an eForm 4 with the demonstration of implementation of Corrective Actions including:

- (1) Discontinue flow back of wells into open top tanks;
  - (1)(a) Source a flowback crew with specialized equipment if the well won't bullhead;
- (2) Reassess and repair grounding/bonding systems; and
- (3) install continuous grounding system from gas buster to tank bottom to prevent "air gap".

COGCC forms are available at <http://cogcc.state.co.us/reg.html#/forms>

**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: 06/07/2019

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



COGCC Representative: Kira Gillette

Title: NOAV Specialist

Email: kira.gillette@state.co.us

Phone Num: ( ) EMAIL \_\_\_\_\_

**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>
402067148	NOAV COVER LETTER
402067149	NOAV CERTIFIED MAIL RECEIPT

Total Attach: 2 Files