

State of Colorado  
Oil and Gas Conservation Commission

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402359314

Date Issued:  
04/14/2020

**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: 17180  
Name of Operator: CITATION OIL & GAS CORP  
Address: 14077 CUTTEN RD  
City: HOUSTON State: TX Zip: 77269

Contact Name and Telephone:  
Name: SHARON WARD  
Phone: (281) 891-1556 Fax: ( )  
Email: sward@cogc.com

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

API Number: 05- - -00 Facility or Location ID: 469896  
Name: Winding Brook Number: 44-25 #1  
QtrQtr: SESE Sec: 25 Twp: 14S Range: 45W Meridian: 6  
County: CHEYENNE

**ALLEGED VIOLATION**

Rule: 906.b.(1)  
Rule Description: Spill Reporting -Report to Director -Threat of Impact  
Initial Discovery Date: 12/12/2019 Was this violation self-reported by the operator? No  
Date of Violation: 12/12/2019 Approximate Time of Violation: \_\_\_\_\_  
Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 906.b.(1), Operator shall submit a Supplemental Spill/Release Report ("Form 19") within 10 calendar days of discovery of any spill in which one barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment.

On December 12, 2019, COGCC environmental staff inspected the Winding Brook 44-25 #1 location (API No. 05-071-07515), operated by Citation Oil & Gas Corp ("Operator") and discovered a reportable spill near the wellhead (Field Inspection No. 700600032; Field Inspection Photo Log, Document No. 700600033).

On December 13, 2019, Operator submitted an Initial Form 19 Spill/Release Report for the spill discovered by COGCC staff at the Winding Brook 44-25 #1 location. As a Condition of Approval, COGCC staff documented that the Supplemental Form 19 Spill/Release Report was due within 10 days of spill discovery, as per Rule 906.b. (Spill/Release Point ID 469896; Form 19 Spill/Release Report, Document No. 402262168).

On January 13, 2020, Operator submitted the Supplemental Form 19 Spill/Release Report for spill ID 469896 (Form 19 Spill/Release Report, Document No. 402283620).

Operator failed to submit to the COGCC a Supplemental Form 19 Spill/Release Report within 10 days of discovery of a spill in which one barrel or more of E&P Waste or produced fluids was spilled outside of berms or other secondary containment, violating Rule 906.b.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 05/14/2020

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

Operator shall submit a Form 19 Supplemental Report with documentation that demonstrates the spill has been remediated and soil complies with Table 910-1 Concentration Levels. This Form 19 Supplemental report shall include the root cause analysis for the spill and measures implemented to prevent future spills.

Operator has 6 other open spills and 4 open Remediation Projects (Listed in NOAV Attachment No. 402359937). Operator shall review unresolved spills and remediations and provide the documentation required to resolve the open spills and remediations, or provide a compliance plan for resolving spills and remediations that lack supporting documentation.

Operator shall provide an internal training program to its relevant staff and contractors on COGCC Rules 906, 909 and 910 and provide documentation to COGCC with the date the training(s) occurred and which Operator personnel or contractors attended.

**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: 04/14/2020

COGCC Representative Signature: /s/ Trent Lindley

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: [trent.lindley@state.co.us](mailto:trent.lindley@state.co.us)

Phone Num: (303) 894-2100x

**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>
402359937	NOAV DOCUMENTATION
402369901	NOAV CERTIFIED MAIL RECEIPT

Total Attach: 2 Files