

State of Colorado
Oil and Gas Conservation Commission

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402513733

Date Issued:
10/19/2020

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: <u>10730</u>	Contact Name and Telephone:
Name of Operator: <u>CWC PETRO LLC</u>	Name: <u>CHRISTOPHER CLARK</u>
Address: <u>6957 #A ISABELL LN</u>	Phone: <u>(303) 519-7870</u> Fax: <u>()</u>
City: <u>ARVADA</u> State: <u>CO</u> Zip: <u>80007</u>	Email: <u>cwclark@cwcpetro.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05- - -00 Facility or Location ID: 296428
Name: MILDRED SOUTH WDW Number: 2-15
QtrQtr: SWSE Sec: 2 Twp: 3S Range: 46W Meridian: 6
County: YUMA

ALLEGED VIOLATION

Rule: 326.a
Rule Description: Injection Wells
Initial Discovery Date: 08/13/2020 Was this violation self-reported by the operator? No
Date of Violation: 04/28/2020 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Yes

Description of Alleged Violation:

Pursuant to Rule 326.a.(4)A, CWC Petro, LLC ("Operator") shall perform a Mechanical Integrity Test ("MIT") on dedicated injection wells at the rate of not less than one test every five years.

Form-21 MIT (document # 400983095) documents that the most recent MIT conducted at the Mildred South WDW 2-15 ("Well") was on April 28, 2015. During a routine inspection on August 13, 2020 (document # 701001116), COGCC staff noted the Well was past due for an MIT and provided a corrective action date of August 22, 2020 for the Operator to conduct an MIT. When Operator did not contact COGCC and no MIT was performed COGCC Underground Injection Control-Lead ("UIC-Lead") contacted Operator by telephone with voicemail message (8:18 AM), 9/18/2020. When Operator did not contact UIC-Lead and no MIT was performed UIC-Lead again contacted Operator via email on September 18, 2020. Operator was given a corrective action date of October 2, 2020 to have the well pass an MIT. Operator has not contacted UIC-Lead or COGCC. As of October 13, 2020, COGCC Records indicate that the Operator has not performed an MIT on the Well.

Operator failed to perform the required five year MIT for an underground injection control well, violating Rule 326.a.(4)A.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 10/19/2020

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

Operator shall perform an MIT on the Well immediately.

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: 10/19/2020

COGCC Representative Signature: 

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: trent.lindley@state.co.us

Phone Num: (303) 894-2100x5143

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>
402513749	NOAV CERTIFIED MAIL RECEIPT

Total Attach: 1 Files