

State of Colorado  
Oil and Gas Conservation Commission

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401645588  
Date Issued:  
05/18/2018  
Date Resolved:  
03/10/2021

**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: 10633  
Name of Operator: CRESTONE PEAK RESOURCES OPERATING LLC  
Address: 1801 CALIFORNIA STREET #2500  
City: DENVER State: CO Zip: 80202

Contact Name and Telephone:  
Name: David Stewart  
Phone: (303) 774-3909 Fax: ( )  
Email: david.stewart@crestonepr.com

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

API Number: 05- - -00 Facility or Location ID: 305447  
Name: Woolley-Sosa-Becky Number: 7H-E168  
QtrQtr: SWNW Sec: 7 Twp: 1N Range: 68W Meridian: 6  
County: WELD

**ALLEGED VIOLATION**

Rule: 34-60-121(1) CRS-b  
Rule Description: Statutory Violation - Permit Violation  
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 COGCC Conditions of Approval ("COAs") in Crestone Peak Resources Operating LLC ("Operator")'s Form 4 Sundry Notices for the Wells located at the Woolley-Becky /7H-E168 well pad (ID No. 305447, "Location") (see attached table for Well API Nos. and Form 4 Document Nos.), Operator was required to perform Bradenhead tests according to the following schedule and submit the Bradenhead test report ("Form 17") within 10 days of each test: 1) Within 60 days of rig release and prior to stimulation and 2) If a delayed completion, 6 months after rig release and prior to stimulation; 3) Within 30 days after first production, as reported on Form 5A.

See attached table for Well-specific rig release date, hydraulic stimulation date, and the consequent date by which Operator was required to perform BH testing on each affected Well at this Location.

Operator failed to perform Bradenhead testing within 60 days of rig release and prior to stimulation, violating Operator's Form 4 COAs and § 34-60-121.(1)(a), C.R.S.

Abatement or Corrective Action Required to be Performed by Operator: \_\_\_\_\_ Corrective Action Due Date: 06/15/2018  
**Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.**

In its Rule 522.d.(2) Answer, due within 28 days of the Operator's receipt of the NOAV, Operator shall provide the following to COGCC:

- Operator shall perform an audit of its Bradenhead testing and reporting for all its wells in Colorado, and submit a list identifying all late or missed tests, and all late or missed forms.

- If a missed Bradenhead test can still be performed (e.g., if stimulation has already occurred, the test due within 60 days of rig release can no longer be performed to qualify as the pre-stimulation test), Operator shall perform the Bradenhead test and submit the required notifications and reporting.

- Operator shall submit all delinquent Form 17 reports.

- Operator shall detail an explanation of how Operator will ensure that future Bradenhead testing required by COGCC Rules and COAs is timely performed, noticed, and reported.

## 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. An answer will, at a minimum, discuss the allegations contained in the NOAV, responding to each; identify corrective actions taken in response to the NOAV, if any; and identify facts known to the operator at the time that are relevant to the operator's response to the alleged violations. 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: 05/18/2018

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: 34-60-121(1)  
CRS-b

Rule Description: Statutory Violation - Permit Violation

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

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

Has corrective action for this violation been performed as required? Yes

Description of Actual Corrective Action Performed by Operator

NOAV closed pursuant to Order 1V-687.

## FINAL RESOLUTION

Cause #: 1V Order #: 687 Docket #: 190100087

Enforcement Action: Administrative Order of Consent

Final Resolution Date: 03/11/2019

Final Resolution Comments:

NOAV closed pursuant to Order 1V-687.

## 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>
401645624	NOAV COVER LETTER
401645625	NOAV CERTIFIED MAIL RECEIPT
401645626	NOAV DOCUMENTATION
401645632	NOAV ISSUED
401645639	NOAV IN PROCESS
401710648	NOAV CERTIFIED MAIL RETURN RECEIPT

Total Attach: 6 Files