

State of Colorado
Oil and Gas Conservation Commission

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Date Issued:
10/14/2021

NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 523, 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 525, 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>96790</u>	Contact Name and Telephone:
Name of Operator: <u>WILLSOURCE ENTERPRISE LLC</u>	Name: <u>REED WILLIAMS</u>
Address: <u>730 17TH ST STE 712</u>	Phone: <u>(303) 575-9696</u> Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>reed@willsourceenterprise.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-077-08760-00 Facility or Location ID: _____
Name: LITTLE BEAVER Number: 1-20
QtrQtr: NENE Sec: 20 Twp: 9S Range: 90W Meridian: 6
County: MESA

ALLEGED VIOLATION

Rule: 326.c
Rule Description: MIT - Temporarily Abandoned Wells

Initial Discovery Date: 10/16/2020 Was this violation self-reported by the operator? No
Date of Violation: 09/30/2020 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 326.c., now Rule 417.c., Willsource Enterprise, LLC ("Operator") is required to conduct a Mechanical integrity test ("MIT") on temporarily abandoned ("TA") wells within thirty (30) days of temporarily abandoning the well, and the at five (5) year intervals after an initial successful MIT.

COGCC staff conducted an audit of COGCC records for Operator and found the Little Beaver 1-20 well reported as TA since November 17, 2004. Operator's most recent MIT was conducted on November 6, 2014. Operator submitted a Form 4, Sundry Notice on January 31, 2020 (document no. 402294733), approved by COGCC staff on March 31, 2020, indicating COGCC granted an exception to delay the MIT.

Operator submitted a Form 42, Field Operations Notice on September 23, 2020 (document no. 402495739), indicating an MIT date of October 3, 2020. COGCC staff conducted an inspection on October 16, 2020 (document no. 699801944), and observed all equipment has been removed from the location and only the wellhead and four rig anchors remain onsite. As of October 14, 2021, Operator has not submitted a Form 21, MIT.

Operator failed to perform an MIT within the five (5) year interval, violating Rule 326.c., now Rule 417.c.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 11/13/2021

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

Operator shall conduct an MIT or plug and abandon the well.

PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 525, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

ANSWER

Pursuant to Rule 523.c.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgment may be entered. Answers are filed by email to dnr_cogccenforcement@state.co.us.

NOAV ISSUED

NOAV Issue Date: 10/14/2021

COGCC Representative Signature: 

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: trent.lindley@state.co.us

Phone Num: (303) 894-2100 x5143

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>

Total Attach: 0 Files