

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
403081133
Date Issued:
06/15/2022
Date Resolved:

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>10758</u>	Contact Name and Telephone:
Name of Operator: <u>OGRIS OPERATING LLC</u>	Name: <u>BONNIE ATWATER</u>
Address: <u>PO BOX 53467</u>	Phone: <u>(432) 967-8995</u> Fax: <u>()</u>
City: <u>MIDLAND</u> State: <u>TX</u> Zip: <u>79710</u>	Email: <u>batwater@ogrisop.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-071-08482-00 Facility or Location ID: _____
Name: APACHE CANYON Number: 13-11
QtrQtr: NESW Sec: 13 Twp: 34S Range: 68W Meridian: 6
County: LAS ANIMAS

ALLEGED VIOLATION

Rule: 417
Rule Description: Mechanical Integrity Testing
Initial Discovery Date: 05/26/2021 Was this violation self-reported by the operator? No
Date of Violation: 10/21/2021 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 417.f., all wells will maintain mechanical integrity. All non-injection wells which lack mechanical integrity, as determined through a mechanical integrity test ("MIT"), shall be repaired or plugged and abandoned within six months. If Ogris Operating LLC ("Operator") has performed an MIT within the 2 years required for Shut-In ("SI") wells, Operator will have 6 months from the date of the unsuccessful test to make repairs or Plug and Abandon the well.

COGCC staff conducted an audit of COGCC records for the Apache Canyon 13-11 well and determined the well has been Shut-In since June 2015.

Operator submitted a Form 21, MIT on June 6, 2016 (document no. 401058772), indicating an MIT was conducted on March 31, 2016.

Operator submitted a Form 21, MIT on May 26, 2021 (document no. 402700719), indicating that a failed MIT was conducted on April 21, 2021.

COGCC staff conducted an inspection on September 3, 2021 (document no. 690202034) and December 29, 2021 (document no. 690202430) noting the failed MIT and requirement of Rule 417.f. to repair or plug and abandon the well which lacks mechanical integrity within 6 months. COGCC staff also issued a Warning Letter on September 22, 2021 (document no. 402820059) reiterating Rule 417.f.'s requirements to repair or plug and abandon a well which lacks mechanical integrity within 6 months.

As of June 15, 2022, Operator has not submitted documentation indicating the well has been repaired or plugged and abandoned. However, Operator submitted a Form 6, Notice of Intent to Abandon for the Apache Canyon 13-11 well on April 20, 2022 (document no. 403021403) indicating an intent to plug and abandon the well.

Operator did not timely repair or plug and abandon the Apache Canyon 13-11 well, violating Rule 417.f.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 07/15/2022

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

Operator shall follow the conditions of approval and general comments from COGCC staff on the Form 6 to continue plugging procedures.

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: 06/15/2022

COGCC Representative Signature: _____

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: trent.lindley@state.co.us

Phone Num: (303) 894-2100 x5143

CORRECTIVE ACTION COMPLETED

Rule: 417

Rule Description: Mechanical Integrity Testing

Corrective Action Start Date: _____ Corrective Action Complete Date: _____

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

Description of Actual Corrective Action Performed by Operator

FINAL RESOLUTION

Cause #: _____ Order #: _____ Docket #: _____

Enforcement Action: _____ Final Resolution Date: _____

Final Resolution Comments:

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>
403081145	NOAV CERTIFIED MAIL RECEIPT
403081147	NOAV ISSUED

Total Attach: 2 Files