

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402391507
Date Issued:
05/08/2020
Date Resolved:
09/27/2022

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: 11065

Name of Operator: BRUCE* JACKIE

Address: 2010 46TH AVE #20

City: GREELEY State: CO Zip: 80634

Contact Name and Telephone:

Name: JACQUELINE BRUCE

Phone: (970) 392-9944 Fax: ()

Email: trent.lindley@state.co.us

Well Location, or Facility Information (if applicable):

API Number: 05-123-10078-00

Facility or Location ID: 242287

Name: BROWN-MONFORT

Number: 1

QtrQtr: NESW

Sec: 10

Twp: 4N

Range: 66W

Meridian: 6

County: WELD

ALLEGED VIOLATION

Rule: 1105

Rule Description: Abandonment

Initial Discovery Date: 07/28/2016

Was this violation self-reported by the operator? No

Date of Violation: 07/28/2016

Approximate Time of Violation:

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 1105.c., Bruce* Jackie ("Operator") must permanently remove a flowline or crude oil transfer line from service by physically separating it from all sources of fluids or pressure within the time frame set forth in Section 1004.a., and comply with removal or abandonment in place rules.

During an inspection on July 28, 2016 (document # 674602717), COGCC Staff observed an improperly abandoned flowline. Specifically, an unused flowline appeared to be partially abandoned but still connected at the wellhead. Staff's corrective action required the Operator to properly abandon the flowline that was no longer in use by October 29, 2016.

During follow-up inspections on January 12, 2017 (document # 674603094), March 19, 2019 (document # 694400107), and March 19, 2020 (document # 694400289), COGCC Staff observed corrective actions from the October 29, 2016 inspection were not complete.

Operator failed to properly abandon flowlines not in use, violating Rule 1105.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 06/06/2020

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

Operator shall abandon all not in use flowline to comply with Rule 1105. Operator shall submit a Form 44 within 30 days of the abandonment of the flowlines.

Rule: 210.b

Rule Description: Signs & Markers- Wells & Batteries

Initial Discovery Date: 07/28/2016

Was this violation self-reported by the operator? No

Date of Violation: 07/28/2016

Approximate Time of Violation:

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 210.b., within 60 days after the completion of a well or the installation of a battery, Bruce* Jackie ("Operator") shall install permanent signage at the wellhead and/or battery. This signage shall provide, among other required information, the name of Operator, a phone number at which Operator can be reached at all times, and a phone number for local emergency services (911 where available).

During an inspection on July 28, 2016 (document # 674602717), COGCC Staff observed there was no sign at the wellhead. Staff required a sign to be installed by August 29, 2016 that complies with the requirements of Rule 210, including but not limited to emergency contact information.

During follow-up inspections on January 12, 2017 (document # 674603094), March 19, 2019 (document # 694400107), and March 19, 2020 (document # 694400289), COGCC Staff observed no sign at the wellhead. The Operator did not comply with the corrective action required in the July 28, 2016 inspection report.

Operator failed to install permanent signage with the required information at the wellhead, violating Rule 210.b.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 06/06/2020

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

Operator shall install signage that provides emergency contact information, including a phone number at which the Operator can be reached at all times and a phone number for local emergency services.

Rule: 326.b

Rule Description: Shut-in Wells

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? Unknown

Description of Alleged Violation:

Pursuant to Rule 326.b., Bruce* Jackie ("Operator") is required to perform a Mechanical Integrity Test ("MIT") on Shut In ("SI") wells within two (2) years of the initial shut-in date and then at five (5) year intervals after an initial successful MIT. COGCC Rules do not permit placing a well back on production to fulfill, or in lieu of, the requirements to conduct an MIT.

During a records search and prior to an inspection on July 28, 2016 (document # 674602717), COGCC Staff observed the well was SI and COGCC records indicate that it has been SI at least back to 2009 with no records indicating an MIT has ever been performed on the Well. The July 28, 2016 inspection report corrective action required the well to have an MIT or be properly plugged and abandoned by October 29, 2016.

During a records review prior to inspections, conducted on January 12, 2017 (document # 674603094), March 19, 2019 (document # 694400107), and March 29, 2020 (document # 694400289), COGCC Staff observed corrective action from the July 28, 2016 inspection report was not complete. As noted in the inspection reports the Operator has not performed an MIT for the SI well or properly plugged and abandoned the well.

As of May 6, 2020, COGCC records indicate that an MIT has not been performed on the Well.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 06/06/2020

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

Operator shall perform a passing MIT and provide a Form 21 with all required information.

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: 05/08/2020

COGCC Representative Signature: _____

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: trent.lindley@state.co.us

Phone Num: (303) 894-2100x

CORRECTIVE ACTION COMPLETED

Rule: 1105

Rule Description: Abandonment

Corrective Action Start Date: _____

Corrective Action Complete Date: _____

Has corrective action for this violation been performed as required? No

Description of Actual Corrective Action Performed by Operator

NOAV dismissed by Enforcement Staff. Operator's right to operate was revoked pursuant to Order No. 1V-628.

Rule: 210.b

Rule Description: Signs & Markers- Wells & Batteries

Corrective Action Start Date: _____

Corrective Action Complete Date: _____

Has corrective action for this violation been performed as required? No

Description of Actual Corrective Action Performed by Operator

NOAV dismissed by Enforcement Staff. Operator's right to operate was revoked pursuant to Order No. 1V-628.

Rule: 326.b

Rule Description: Shut-in Wells

Corrective Action Start Date: _____

Corrective Action Complete Date: _____

Has corrective action for this violation been performed as required? No

Description of Actual Corrective Action Performed by Operator

NOAV dismissed by Enforcement Staff. Operator's right to operate was revoked pursuant to Order No. 1V-628.

FINAL RESOLUTION

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

Enforcement Action: Dismissed by Issuing Unit

Final Resolution Date: 09/27/2022

Final Resolution Comments:

NOAV dismissed by Enforcement Staff. Operator's right to operate was revoked pursuant to Order No. 1V-628.

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>
402391507	NOAV APPROVED
402393631	NOAV CERTIFIED MAIL RECEIPT
402393885	NOAV ISSUED
402393886	NOAV IN PROCESS

Total Attach: 4 Files