

State of Colorado
Oil and Gas Conservation Commission

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Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
403261351
Date Issued:
12/14/2022
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>100322</u>	Contact Name and Telephone:
Name of Operator: <u>NOBLE ENERGY INC</u>	Name: <u>MOSIAH MONTOYA</u>
Address: <u>2001 16TH STREET SUITE 900</u>	Phone: <u>(303) 249-2425</u> Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>mo.montoya@chevron.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-123-49026-00 Facility or Location ID: _____
Name: Booth Number: D11-775
QtrQtr: NENW Sec: 2 Twp: 3N Range: 64W Meridian: 6
County: WELD

ALLEGED VIOLATION

Rule: 419.b.
Rule Description: Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment
Initial Discovery Date: 11/16/2022 Was this violation self-reported by the operator? No
Date of Violation: 10/26/2022 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 419.b.(2)E.i., if at any time during Hydraulic Fracturing Treatment operations, the Bradenhead Annulus pressure in psig in the Well being Stimulated or any Well being monitored has Bradenhead pressure exceeding 30% of the TVD in feet of the surface casing shoe expressed in psig, or Noble Energy, Inc. ("Operator") has reason to suspect any potential failure of the production casing or Stimulation string, Operator will safely and quickly discontinue the Stimulation and dissipate the annular pressure.

COGCC staff received Operator's Form 17, Bradenhead Test Report on October 26, 2022 (document no. 403209153), that recorded an existing surface casing pressure of 207 psig.

Staff requested Bradenhead monitoring data on October 31, 2022 and again on November 16, 2022 in a monthly meeting with Operator, and received the data later the same day. Staff determined, after a review of the Bradenhead monitoring data, Operator failed to discontinue the Stimulation and dissipate the annular pressure after at least one pressure spike of the Bradenhead Annulus pressure, with the data showing possibly more than one occurrence.

Operator failed to discontinue the Stimulation and dissipate the annular pressure after incurring Bradenhead Annulus pressure spikes, violating Rule 419.b.(2)E.i.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date:

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

Operator shall perform an audit of all wells stimulated in 2022 for Bradenhead Annulus pressure exceedances during Hydraulic Fracturing Treatment, and submit the results of the audit via email to dnr_cogccenforcement@state.co.us and, in the event Bradenhead Annulus pressure exceedances are discovered, comply with any outstanding requirements of Rule 419.b.

Rule: 419.b.Rule Description: Bradenhead Annulus Monitoring - During Hydraulic Fracturing TreatmentInitial Discovery Date: 11/16/2022 Was this violation self-reported by the operator? NoDate of Violation: 10/26/2022 Approximate Time of Violation: _____Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 419.b.(2)E.ii., if at any time during Hydraulic Fracturing Treatment operations, the Bradenhead Annulus pressure in psig in the Well being Stimulated or any Well being monitored has Bradenhead pressure exceeding 30% of the TVD in feet of the surface casing shoe expressed in psig, or Noble Energy, Inc. ("Operator") has reason to suspect any potential failure of the production casing or Stimulation string, Operator will notify the Director as soon as practicable but no later than 24 hours following the occurrence with a Form 42, Notice of High Bradenhead Pressure During Stimulation.

COGCC staff received Operator's Form 17, Bradenhead Test Report on October 26, 2022 (document no. 403209153), that recorded an existing surface casing pressure of 207 psig.

Staff requested Bradenhead monitoring data on October 31, 2022 and again on November 16, 2022 in a monthly meeting with Operator, and received the data later the same day. Staff determined, after a review of the Bradenhead monitoring data, Operator failed to notify the Director of at least one pressure spike of the Bradenhead Annulus pressure, with the data showing possibly more than one occurrence.

COGCC staff conducted an audit of COGCC records and, as of December 12, 2022, Operator failed to notify of Bradenhead pressure spike(s) on a Form 42, Notice of High Bradenhead Pressure During Stimulation, within 24 hours following the occurrence(s), violating Rule 419.b.(2)E.ii.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 01/13/2023**Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.**

Operator shall complete and submit a Form 42, Notice of High Bradenhead Pressure During Stimulation. Staff would like a late Form 42 to be filed so the well file is complete for future reference.

Rule: 419.b.Rule Description: Bradenhead Annulus Monitoring - During Hydraulic Fracturing TreatmentInitial Discovery Date: 11/16/2022 Was this violation self-reported by the operator? NoDate of Violation: 10/26/2022 Approximate Time of Violation: _____Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 419.b.(2)E.iv., if at any time during Hydraulic Fracturing Treatment operations, the Bradenhead Annulus pressure in psig in the Well being Stimulated or any Well being monitored has Bradenhead pressure exceeding 30% of the TVD in feet of the surface casing shoe expressed in psig, or Noble Energy, Inc. ("Operator") has reason to suspect any potential failure of the production casing or Stimulation string, Operator will submit a Form 4, providing all details, including whether a downhole failure or migration pathway occurred, cause of the high pressure or suspected failure, and corrective measures taken within 15 days after the occurrence.

COGCC staff received Operator's Form 17, Bradenhead Test Report on October 26, 2022 (document no. 403209153), that recorded an existing surface casing pressure of 207 psig.

Staff requested Bradenhead monitoring data on October 31, 2022 and again on November 16, 2022 in a monthly meeting with Operator, and received the data later the same day. Staff determined, after a review of the Bradenhead monitoring data, Operator failed to submit a Form 4 providing details regarding at least one pressure spike of the Bradenhead Annulus pressure, with the data showing possibly more than one occurrence.

COGCC staff conducted an audit of COGCC records and, as of December 12, 2022, Operator has not submitted a Form 4, providing all details, including whether a downhole failure or migrations pathway occurred, cause of the high pressure or suspected failure, and corrective measures taken, violating Rule 419.b.(2)E.iv.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 01/13/2023

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

Operator shall submit a Form 4, providing all details regarding the pressure spike(s), including whether a downhole failure or migrations pathway occurred, suspected cause of the high pressure or suspected failure, and what corrective measures were taken. The wellhead and wellbore configuration should be described. Supporting documentation for changes to wellhead or wellbore configuration should be included. Monitoring data during stimulation should be included (time, date, pressures on all annuli). Pressures seen at the wellhead should be detailed.

Operator shall perform an audit of all wells stimulated in 2022 for Bradenhead Annulus pressure exceedances during Hydraulic Fracturing Treatment, and submit the results of the audit via email to dnr_cogccenforcement@state.co.us and, in the event Bradenhead Annulus pressure exceedances are discovered, comply with any outstanding requirements of Rule 419.b.

Rule: 419.b.

Rule Description: Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment

Initial Discovery Date: 11/16/2022

Was this violation self-reported by the operator? No

Date of Violation: 10/26/2022

Approximate Time of Violation:

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 419.b.(2)E.iii., if at any time during Hydraulic Fracturing Treatment operations, the Bradenhead Annulus pressure in psig in the Well being Stimulated or any Well being monitored has Bradenhead pressure exceeding 30% of the TVD in feet of the surface casing shoe expressed in psig, or Noble Energy, Inc. ("Operator") has reason to suspect any potential failure of the production casing or Stimulation string, Operator will perform diagnostic testing on the Well and related equipment as is necessary as soon as is reasonably practicable after Operator has reasonable cause to know of or suspect any such failure.

COGCC staff received Operator's Form 17, Bradenhead Test Report on October 26, 2022 (document no. 403209153), that recorded an existing surface casing pressure of 207 psig.

Staff requested Bradenhead monitoring data on October 31, 2022 and again on November 16, 2022 in a monthly meeting with Operator, and received the data later the same day. Staff determined, after a review of the Bradenhead monitoring data, Operator was required to perform diagnostic testing on the Well and related equipment after at least one pressure spike of the Bradenhead Annulus pressure, with the data showing possibly more than one occurrence.

Operator failed to perform diagnostic testing on the Well and related equipment after incurring Bradenhead Annulus pressure spikes, violating Rule 419.b.(2)E.iii.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 01/13/2023

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

Operator shall submit a Form 4, providing all details regarding the pressure spike(s), including whether a downhole failure or migrations pathway occurred, suspected cause of the high pressure or suspected failure, and what corrective measures were taken. The wellhead and wellbore configuration should be described. Supporting documentation for changes to wellhead or wellbore configuration should be included. Monitoring data during stimulation should be included (time, date, pressures on all annuli). Pressures seen at the wellhead should be detailed.

Operator shall perform an audit of all wells stimulated in 2022 for Bradenhead Annulus pressure exceedances during Hydraulic Fracturing Treatment, and submit the results of the audit via email to dnr_cogccenforcement@state.co.us and, in the event Bradenhead Annulus pressure exceedances are discovered, comply with any outstanding requirements of Rule 419.b.

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: <u>12/14/2022</u>	
COGCC Representative Signature: _____	
COGCC Representative: <u>Trent Lindley</u>	Title: <u>NOAV Specialist</u>
Email: <u>trent.lindley@state.co.us</u>	Phone Num: <u>(303) 894-2100x5143</u>

CORRECTIVE ACTION COMPLETED

Rule: <u>419.b.</u>	
Rule Description: <u>Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment</u>	
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 _____	

Rule: <u>419.b.</u>	
Rule Description: <u>Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment</u>	
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 _____	

Rule: <u>419.b.</u>	
Rule Description: <u>Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment</u>	
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 _____	

Rule: <u>419.b.</u>	
Rule Description: <u>Bradenhead Annulus Monitoring - During Hydraulic Fracturing Treatment</u>	
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.

Document Number	Description
403261365	NOAV CERTIFIED MAIL RECEIPT
403261372	NOAV ISSUED

Total Attach: 2 Files