

State of Colorado
Energy & Carbon Management Commission

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Document Number:
403199746
Date Issued:
10/17/2022
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>76859</u>	Contact Name and Telephone:
Name of Operator: <u>SCHREIDER & COMPANY INC</u>	Name: <u>RUDY SCHREIDER JR</u>
Address: <u>9227 E LINCOLN AVE SUITE 200</u>	Phone: <u>(720) 570-1368</u> Fax: <u>()</u>
City: <u>LONE TREE</u> State: <u>CO</u> Zip: <u>80124</u>	Email: <u>schreiderco@outlook.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-001-09067-00 Facility or Location ID: _____
Name: CHER SKOUBO Number: 14-43
QtrQtr: NWSW Sec: 14 Twp: 2S Range: 62W Meridian: 6
County: ADAMS

ALLEGED VIOLATION

Rule: 309
Rule Description: Operator's Monthly Report of Operations
Initial Discovery Date: 02/16/2022 Was this violation self-reported by the operator? No
Date of Violation: 02/16/2022 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Unknown
Description of Alleged Violation:

Pursuant to Rule 309.a., now Rule 413.a., Schreider & Company, Inc. ("Operator") is required to submit a Form 7, Monthly Report of Operations, for all existing oil and gas wells that are not plugged and abandoned, within 45 days after the end of each month. Operator is required to report the well every month from the month it is spud until it has been reported for one month as abandoned. Operator is required to report each formation that is completed in a well every month from the time that it is completed until one month after abandonment.

Based on COGCC records, Operator has not filed a Form 7, Monthly Report of Operations, for the Cher Skoubo #14-43 well for the following months: September 2016, November 2016, March 2019, August 2019, September 2021, June 2022, and July 2022, violating Rule 309.a., now Rule 413.a.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 11/16/2022
Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.
Operator shall submit any delinquent forms, notices, or reports, and correct any incomplete or inaccurate reports.

Rule: 326.b

Rule Description: Shut-in Wells

Initial Discovery Date: 05/18/2022

Was this violation self-reported by the operator? No

Date of Violation: 07/31/2017

Approximate Time of Violation: _____

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 326.b., now Rule 417.b., Schreider & Company, Inc. ("Operator") is required to conduct an Mechanical Integrity Test ("MIT") on shut-in ("SI") wells within two years of the initial shut-in date and then at five (5) year intervals after an initial successful MIT, as long as the well remains SI.

COGCC staff conducted an inspection of the Cher Skoubo #14-43 well on May 18, 2022 (document no. 403052898), requiring Operator to conduct an MIT on the well, with a corrective action date of June 14, 2022.

COGCC staff next issued a Warning Letter for the Cher Skoubo #14-43 well on August 29, 2022 (document no. 401592439), requiring Operator to conduct an MIT.

According to COGCC Records, reviewed October 13, 2022, Operator's Cher Skoubo #14-43 well has been SI since July 2015 without an MIT being conducted, violating Rule 326.b., now Rule 417.b.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 11/16/2022

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

Operator shall conduct an MIT on the Cher Skoubo #14-43 well or plug and abandon the well.

Rule: 419

Rule Description: Bradenhead Monitoring, Testing, and Reporting

Initial Discovery Date: 10/13/2022

Was this violation self-reported by the operator? No

Date of Violation: 12/31/2021

Approximate Time of Violation: _____

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 419.c., Schreider & Company, Inc. ("Operator") is required to perform an annual Bradenhead Test and submit the data on a Form 17, Bradenhead Test Report, within 10 days after the test.

COGCC staff conducted an audit of COGCC records for the Cher Skoubo #14-43 well on October 13, 2022, and determined that Operator has not filed a Form 17 for the year of 2021, reporting that a Bradenhead Test was conducted, violating Rule 419.c.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 11/17/2022

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

Operator shall conduct a Bradenhead Test or submit any delinquent Form 17s.

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>10/17/2022</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>309</u>
Rule Description: <u>Operator's Monthly Report of Operations</u>
Corrective Action Start Date: _____ Corrective Action Complete Date: _____
Has corrective action for this violation been performed as required? <u>No</u>
Description of Actual Corrective Action Performed by Operator
<u>NOAV resolved pursuant to Order 1V-847.</u>

Rule: <u>326.b</u>
Rule Description: <u>Shut-in Wells</u>
Corrective Action Start Date: _____ Corrective Action Complete Date: _____
Has corrective action for this violation been performed as required? <u>No</u>
Description of Actual Corrective Action Performed by Operator
<u>NOAV resolved pursuant to Order 1V-847.</u>

Rule: <u>419</u>
Rule Description: <u>Bradenhead Monitoring, Testing, and Reporting</u>
Corrective Action Start Date: _____ Corrective Action Complete Date: _____
Has corrective action for this violation been performed as required? <u>No</u>
Description of Actual Corrective Action Performed by Operator
<u>NOAV resolved pursuant to Order 1V-847.</u>

FINAL RESOLUTION

Cause #: <u>1V</u> Order #: <u>847</u> Docket #: <u>220400089</u>
Enforcement Action: <u>Order Finding Violation</u> Final Resolution Date: _____
Final Resolution Comments:
<u>NOAV resolved pursuant to Order 1V-847.</u>

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number	Description
403199787	NOAV CERTIFIED MAIL RECEIPT
403199807	NOAV ISSUED
403199812	NOAV IN PROCESS

Total Attach: 3 Files