



**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303) 894-2100 Fax: (303) 894-2109



FOR OGCC USE ONLY

COMPLAINT REPORT

This form may be submitted by any party with a complaint regarding oil and gas extractive operations. The complainant is to complete this form and mail to: COGCC, 1120 Lincoln St., Ste. 801, Denver, CO 80203 or fax to (303) 894-2109. COGCC will investigate the complaint and determine what action, if any, should be taken.

Complaint taken by: _____
API Number: _____
Facility ID: _____

COMPLAINT TYPE

Environmental Damage Noise Payment Site Maintenance Other (describe): _____

COMPLAINANT INFORMATION

Name of Complainant:			Phone Numbers		
Address:			No:		
City:	State:	Zip:	Fax:		
Date Complaint Taken by OGCC:			E-Mail:		
Connection to Incident (Land Owner, Royalty Owner, etc.):					

**DESCRIPTION OF COMPLAINT
(Please be as specific as possible)**

Name of Operator:	OGCC Operator Number:
Date of Incident:	Facility Name:
Type of Facility (Well, Tank Battery, Flow Line, Pit):	QtrQtr: Section:
Well Name and Number:	Township: Range: Meridian:
County:	
Was the operator contacted? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, contact name:	
Provide a detailed description of the incident, problem and cause (equipment failure, human error, etc.):	

OTHER NOTIFICATIONS

List the parties and agencies notified (County, BLM, EPA, DOT, Local Emergency Planning Coordinator or other).

Date	Agency	Contact Person	Response

Complaint Tracking Number: _____

BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO

Attachment to Form 18

WildEarth Guardians, through Colorado attorney Katherine Merlin, hereby submits the following complaint against operator number 17180, Citation Oil and Gas Corporation, for the following alleged violations.

1. Citation Oil and Gas Corp. (“Citation”) owns and operates the temporarily abandoned wells identified below. These wells are identified by their name and facility identity. Each of these wells is subject to Rule 417.c.(1), requiring that a Mechanical Integrity Test be performed within 30 days and 417.c.(2) requiring that MITs be repeated every five years thereafter. WildEarth Guardians has reason to believe that the following wells either entirely lack MITs or were required to perform additional MITs by the passage of five years, and that such MITs were not performed.

Well Name	Facility ID	Status	Status Date	Last MIT date
1 White 22-25 #3	207587	TA	9/2/1987	6/6/2014
2 MPU 42-29 #9	207627	TA	11/2/1987	6/6/2014
3 Frontera Unit 33-12 #5	207770	TA	6/9/1997	3/23/2016
4 Kern 43-3 #1	208030	TA	4/28/2010	5/28/2015
5 Rhoades 42-35 #5	207717	TA	9/15/2014	4/12/2016
6 Arapahoe Unit #129(24-25)	207820	TA	10/14/2015	10/21/2015
7 Frank 41-29 #1	208123	TA	10/1/2017	9/8/2015
8 Mount Pearl Unit #13-25	207573	TA	2/25/2020	<i>No record</i>
9 W E Dickinson #3	219645	TA	9/1/2020	<i>No record</i>
10 UPRC-Simpson 12-19 #1	207769	TA	3/1/2019	<i>No record</i>
11 Arapahoe Unit #102(14-6)	207841	TA	3/1/2019	<i>No record</i>
12 Frontera Unit 42-12 #3	207842	TA	3/1/2019	5/12/2015
13 Dubois #5	257040	TA	2/1/2019	9/11/2000
14 Arapahoe Unit #121(23-32)	207793	TA	1/1/2019	<i>No record</i>

2. The aforementioned Citation wells have been idled for as long as 34 years. Many did not produce for years prior to their official status date. Arapahoe #129 last reported production 2013, Mount Pearl Unit #129, last reported production 2017, and Kern 43-3, last produced in 2006.

3. Citation owns and operates several wells for which Mechanical Integrity Testing was performed more than 30 days ago but not reported on a Form 21 in violation of Rule 418, including:

Well Name	Facility ID	Status	Status Date	Last reported MIT date
1 Frontera Unit 14-18 #21	207906	TA	6/9/1997	3/23/2016
2 Frontera 41-24 #24	207844	TA	6/9/1997	3/23/2016
3 McCormick 22-3 #11	207351	TA	11/1/2001	6/6/2014
4 Arapahoe Unit #155 (32-21)	207819	TA	5/15/2005	5/28/2015
5 MPU #33-35	207575	TA	9/1/2020	4/12/2016

4. Although some wells possess notices related to intent to perform Mechanical Integrity Testing, no test results were reported.

5. Arapahoe Unit #129(24-25) is the subject of a field operation notice to plug and abandon in April of 2021, but no Form 6 subsequent report of abandonment was filed in violation of Rule 435.b(1). Furthermore, by April of 2021 this well was six months past the date for required Mechanical Integrity Testing in violation of Rule 417.c.

6. Frank 41-29 #1 is the subject of a field operation notice to plug and abandon in March of 2021, but no Form 6 subsequent report of abandonment was filed in violation of Rule 435.b(1). Furthermore, by March of 2021 this well was six months past the date for required Mechanical Integrity Testing in violation of Rule 417.c.

7. Mount Pearl Unit #13-25 is the subject of a field operation notice to plug and abandon in March of 2021, but no Form 6 subsequent report of abandonment was filed in violation of Rule 435.b(1). Furthermore, by March of 2021 this well was 13 months past the date for required Mechanical Integrity Testing in violation of Rule 417.c.

8. W E Dickinson #3 is the subject of a notice of intent to plug and abandon in March of 2021, but no Form 6 subsequent report of abandonment was filed in violation of Rule 435.b(1). Furthermore, by March of 2021 this well was five months past the date for required Mechanical Integrity Testing in violation of Rule 417.c.

9. Arapahoe Unit #102(14-6) is the subject of a sundry notice that states that the well was returned to production in May of 2021. However, by May of 2021 the well was 26 months post temporary abandonment without any Mechanical Integrity Testing.

10. The Mount Pearl Unit #13-25 facility was the subject of an NOAV on September 1, 2019. Citation was required to perform an MIT or do plugging and abandonment with a compliance date of February 11, 2021. Although Citation filed a Form 6, Notice of Intent to Abandon on February 3, 2021, it filed further "plans" regarding the intent to abandon on April 20, 2021. It has not to date reported that it has completed the required plugging and abandoning work. Failure to complete corrective action by the compliance deadline is an independent violation of Rule 523.f.

11. Citation received a NOAV on 1/14/2020 with a compliance date of February 14, 2020. This NOAV was for the W E Dickinson 3 well and the Arapahoe Unit 146 (23-22) (plugged and abandoned on the compliance date). The required corrective actions included performance of an audit of its monthly production reporting as well as Mechanical Integrity Testing and MIT reporting "for all its wells in Colorado," and annual submission of a Sundry Notice for each of its temporarily abandoned wells stating the method the well is closed to the atmosphere and plans for future operation ("Form 4-TA"); submission of all delinquent Form 7 reports. Complainant is unsure whether this audit was completed, however the documentation for the MIT-delinquent wells mentioned supra in paragraph 1 do not contain (or reflect late submission of) the annual

Form 4-TA filings, of which there should now be two per well. Failure to complete corrective action by the compliance deadline is an independent violation of Rule 523.f.

12. Citation received a NOAV on February 14, 2019, for its UPRC-Simpson 12-19 #1, after an COGCC staff conducting an inspection at the well “observed a steady, forceful stream of natural gas venting from an open valve at the wellhead, and a 4 gas meter detected methane gas from the stream.”

COGCC Staff observed that no upset conditions or other 912.b. exceptional circumstances were occurring at the time of the venting, and that Operator had neither requested nor received approval from COGCC for venting/flaring at the Well location. On February 13, 2019, COGCC Staff conducted a follow up inspection of the Well location and observed that a threaded plug had been placed in the valve noted as open in the January 31 inspection, but that methane gas was still venting through the plug.

Citation NOAV, document no. 401939601 (internal references omitted). The inspection on February 2, 2019 stated that Citation should “repair or replace valve and/or plug.” COGCC staff inspected the well on January 5, 2021, and noted that the well was shut in, but did not report any particular examination of the area to determine that shutting in the well had stopped the gas leak.

13. The Colorado Oil and Gas Conservation Commission has \$1,135,000 in financial assurances from Citation Oil and Gas. According to the Commission’s active operator list, <https://drive.google.com/file/d/17GyEwZZ1KON6DCGBoRhrGL08fSUsofLJ/view>, Citation owns 177 wells, of which 99 are producing. This does not include the 292 non-well facilities owned by Citation including several spills, compressor stations, pits, UIC disposal, and enhanced recovery facilities. Allocating the available financial assurances over the wells alone results in a pro-rata share of less than \$6,500 per well. This is inadequate to ensure financial responsibility.

Citation Oil and Gas Corp. has now been the subject of multiple NOAVs pertaining to its ongoing and widespread lack of MIT performance. These previous NOAVs have not resulted in compliance. WildEarth Guardians requests that the Commission (1) find that Citation is in violation of the rules cited above, (2) impose penalties for the aforementioned alleged violations pursuant to Rule 523, (3) increase financial assurance requirements, (4) order that the above-mentioned wells be plugged and abandoned, and (5) impose other necessary and appropriate relief as authorized by law.

/s/ Katherine Merlin

Katherine Merlin
WildEarth Guardians
Climate and Energy Program, Colorado Attorney
3798 Marshall St., Suite 8
Wheat Ridge, CO 80033
(720) 965-0854
kmerlin@wildearthguardians.org