

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
Complaint Seeking Order Finding Violation and Penalties

WildEarth Guardians, through Colorado attorney Katherine Merlin, hereby submits the following complaint against operator number 10657, PCR Operating LLC (“PCR”), for the following alleged violations.

1. PCR 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	AJU GLN-BDL #D01	225183	TA	3/1/1978	11/16/2015
2	ADENA J SAND UNIT #W-31	225155	TA	4/27/1990	1/6/2012
3	GLENN #B-1	224999	TA	5/30/1990	4/21/2014
4	GLENN-WALSH #2	225149	TA	4/29/1996	11/16/2015
5	SCANLON, J L #5	224737	TA	5/23/1996	9/30/2015
6	GLENN #J-4	225161	TA	3/8/2004	<i>No record</i>
7	C H O’Neill #2	225052	TA	12/13/2012	<i>No record</i>
8	GLENN-BIDDLE #A-2	225116	TA	1/21/2013	11/23/2015
9	HOUGH, R.M. #A-2	224985	TA	2/1/2021	<i>No record</i>
10	HOUGH, R M #B-2	225003	SI	3/1/2019	11/1/2013
11	ADENA J SAND UNIT #W-10	227411	SI	2/1/2019	11/20/2014
12	GLENN-STEPHENSON #2	225063	SI	12/6/2018	<i>No record</i>
13	HOUGH #157-7-H1	430990	SI	9/1/2018	<i>No record</i>
14	HOUGH, R M #B-1	225002	SI	9/1/2018	5/15/2014
15	AJU Glenn #F-2	225019	SI	8/1/2017	<i>No record</i>
16	VERONICA #1	225001	SI	8/1/2017	11/18/2015
17	AJU JOHNSON-GLN #1	224887	SI	11/1/2015	3/29/2014
18	CLAR, L #1	224846	SI	8/3/2015	7/14/2014
19	Davis, R.Y. #4	225070	SI	7/29/2015	11/24/2014
20	GLENN #I-1	225184	SI	7/29/2015	8/21/2014
21	STATE OF COLORADO #C-1	224948	SI	4/1/2015	<i>No record</i>
22	Clar #2	224866	SI	1/28/2014	2/28/2013
23	GEYER, HARRY #A-6	225075	SI	4/1/2012	<i>No record</i>
24	GLENN-BIDDLE #B-3	225114	SI	4/1/2012	11/26/2015
25	GLENN-BIDDLE #C-8	225113	SI	4/1/2012	<i>No record</i>
26	AJU GLN-BDL #B13	225106	SI	4/1/2012	11/28/2015
27	AJU GLN-BDL #B-6	225097	SI	4/1/2012	<i>No record</i>
28	GLENN-BIDDLE #B-7	225096	SI	4/1/2012	9/30/2015
29	PRICE #13-25	266544	SI	1/24/2011	2/19/2015
30	AJU GEYER #C1	225072	SI	1/1/2002	<i>No record</i>
31	PEIF, R #3	225038	SI	1/1/2002	<i>No record</i>
32	PEIF* R #5	225049	SI	1/1/2002	<i>No record</i>
33	COEN, M E #5	225006	SI	1/1/1999	9/30/2015

34	COEN, M E #1	224968	SI	1/1/1999	No record
35	COEN, M E #6	224982	SI	8/27/1998	No record
36	TIMPE #2	225224	SI	8/27/1998	No record
37	GLENN-BIDDLE #B-5	225111	SI	8/27/1998	No record
38	AJU GLN-BDL #C09	225091	SI	8/27/1998	No record
39	AJU GLENN #J2	225145	SI	8/27/1998	No record
40	GLENN #E-4	225129	SI	8/27/1998	12/3/2015
41	Glenn #E-2	225130	SI	8/27/1998	No record
42	GLENN #E-1	225108	SI	8/27/1998	12/3/2015
43	Howard Glenn #E-3	225119	SI	8/27/1998	No record
44	STATE OF COLORADO #C-3	224926	SI	6/1/1998	12/4/2015
45	LAUGHLIN, R J #8	224909	SI	6/1/1998	No record
46	GLENN #H-1	225023	SI	6/1/1998	No record
47	C.H. O'Neill #3	225081	SI	6/1/1998	12/3/2015
48	GLENN #G-1	224976	SI	6/1/1998	11/3/2015
49	State of Colorado #A-1	225115	SI	6/1/1998	No record
50	State of Colorado #B-2	225092	SI	6/1/1998	11/3/2015
51	STATE OF COLORADO #A-2	225094	SI	6/1/1998	12/3/2015
52	HARRY GEYER B #2	225018	SI	1/22/1997	No record
53	COEN, M E #7	224967	SI	1/1/1991	No record
54	AJU #W-40	224735	SI	8/10/1988	8/2/2010
55	ADENA J SAND UNIT #W-39	224763	SI	9/15/1987	7/2/2015
56	C.H. O'Neill #1	225074	SI	2/7/1984	No record
57	FLB #1	224896	SI	11/11/1911	No record
58	FLB #2	224891	SI	11/11/1911	No record
59	DEWEY #5	224843	SI	11/11/1911	No record
60	DEWEY #6	224824	SI	11/11/1911	12/3/2015
61	DELANEY #1	224790	SI	11/11/1911	No record
62	SCANLON, J L #1	224759	SI	11/11/1911	No record
63	GOEDERT, M J #3	224762	SI	11/11/1911	No record

2. Many of these wells, even those with a more recent status date, have been SI/TA for decades. For example the Glenn-Biddle C-8 well (status date 2012) has been SI/TA “since prior to 1/1/99” and the AJU Gln-Bdl #B13 has been SI/TA since 2002 (status date 2012).

3. Some of these MITs were performed to verify repairs even before the well was shut in, including the AJU JOHNSON-GLN #1, CLAR, L #1, Davis, R.Y. #4, and the GLENN #I-1

4. The Adena J Sand Unit W-39 well was the subject of a warning letter on September 17, 2020 for failure to submit production reports and failure to perform Mechanical Integrity Testing. The corrective action deadline date was 12/31/2020. No apparent corrective action was taken, in violation of Rule 523.f.

5. The Price #13-25 well was the subject of a warning letter on March 9, 2020, for failure to submit monthly production reports and failure to conduct Mechanical Integrity Testing. The corrective action deadline date was June 30, 2020 – more than three months later. A second, duplicate, warning letter was sent on November 24, 2020, after the June 30 deadline passed without corrective action. No apparent corrective action was taken, in violation of Rule 523.f.

6. The Clar L #1 well received a warning letter on December 23, 2019, for failure to submit monthly production reports and failing to conduct Mechanical Integrity Testing, with a corrective action deadline of March 31, 2020. No corrective action appears to have been taken, in violation of Rule 523.f., and no further action appears to have been taken against PCR.

7. The Hough R M B-2 well received a warning letter on June 12, 2019, for failure to submit monthly production reports and failing to conduct Mechanical Integrity Testing, with a corrective action deadline of September 30, 2019. No corrective action appears to have been taken, in violation of Rule 523.f., and no further action appears to have been taken against PCR.

8. The Glenn-Biddle C-8 well received an inspection on March 18, 2020, noting that the well had been SI/TA “since prior to 1/1/99” and had no record of any MIT being performed. PCR was requested to contact COGCC engineering, however since that time no MIT has been performed and it does not appear that COGCC ever issued a formal warning.

9. The Adena J Sand Unit W-10 was returned to injecting status in March of 2021. No Form 42 return to service was filed. No MIT was performed as required by Rule 417.a.

10. PCR has received at least three NOAVs for failure to submit monthly production reports, on January 15, April 14, and May 15, of 2020.

11. No NOAV exists in PCR’s COGIS file for failure to conduct MITs at any of its wells, despite numerous warnings and no evidence of corrective action having been taken.

12. PCR has a total of \$535,000 in financial assurance bonding, according to COGCC Active Operator Data. \$400,000 of this bonding is for excess inactive wells. PCR has 163 wells, of which only 7 are producing, and 149 are shut in or temporarily abandoned. Additionally, it owns hundreds of non-well facilities, including numerous active pits (many of which have never been inspected, according to COGCC data) and 173 active locations.

PCR Operating LLC has now been the subject of multiple warnings pertaining to its ongoing and widespread lack of MIT performance and its failures to report production. These previous warnings and inspections have not resulted in compliance. WildEarth Guardians requests that the Commission (1) find that PCR 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

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