



**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 10369, Natural Resource Group Inc. (“NRG”), for the following alleged violations.

1. NRG 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.

<b>Well Name</b>	<b>Facility ID</b>	<b>Status</b>	<b>Status Date</b>	<b>Last MIT date</b>
1 LEWTON COMPANY F UNIT #1	203411	TA	1/1/2019	<i>No record</i>
2 RMPCO-UPRR-NICHOLS #1	202754	SI	1/1/2019	<i>No record</i>
3 SHANNON-ROBERTS #1-A	240910	SI	7/1/2018	<i>No record</i>
4 SHANNON-ROBERTS #3	240972	SI	4/1/2018	<i>No record</i>
5 SHANNON-ROBERTS #2	240971	SI	4/1/2018	<i>No record</i>
6 SHANNON-ROBERTS #4	240973	SI	4/1/2018	<i>No record</i>
7 GARCIA #34-14	259322	SI	8/1/2017	8/28/2003
8 MIRAH #1	293813	SI	8/1/2017	<i>No record</i>
9 GARCIA #3-5	259321	SI	8/1/2017	7/23/2015
10 GARCIA #4-12	259320	SI	8/1/2017	2003
11 WINDY POINT #1	297607	SI	3/1/2015	<i>No record</i>
12 Largo #2	428436	SI	3/1/2015	<i>No record</i>

2. The COGCC attempted to inspect the UIC well, Garcia 3-5 in 2019 but were unable to due to the well being shut-in. The COGCC attempted to contact NRG to facilitate an inspection and never received a call back, so no further inspection was performed. Failure to allow COGCC inspectors adequate access to regulated facilities is a violation of Commission Rule 204.

3. NRG filed notices of intent to abandon for several of its wells including the MIRAH #1, GARCIA #4-12, and WINDY POINT #1, but no evidence of plugging and abandonment exists in the files associated with the wells. If plugging and abandonment did occur at any of these locations NRG was required to file a Form 6 notice of subsequent abandonment within 30 days pursuant to Rule 435.b.(1).

4. NRG filed a notice of intent to abandon for its Largo #2 well in January 2018. No form 6 notice of subsequent abandonment was approved and does not appear in the file associated with the well. An inspection in August of 2019 identified corrective actions related to reclamation, however no follow up inspection occurred. Upon information and belief – the contents of the file associated with this well – the required corrective actions have not occurred.

5. NRG was required to perform corrective action by an inspection at its LEWTON COMPANY F UNIT 1 well on December 21, 2020. The inspection identified a number of previous required corrective actions that had not been addressed, dating as far back as 2017. NRG apparently failed to perform the required corrective action and failed to submit a Field Inspection Report Resolution Form in violation of Rule 210.
6. NRG was required to perform corrective action by an inspection at its Mirah 1 well on July 29, 2020. Inspection revealed uncontrolled venting at the site, requiring a FLIR inspection. Inspectors at that time reported “no viable operator,” yet as of the filing of this Complaint the Natural Resource Group Inc. is being reported as an “active operator” with an outstanding bond and its facilities have not been deemed to be orphaned.
7. NRG was required to perform corrective action by an inspection at its Largo 2 well on August 19, 2019. While the inspector noted that it “appears the well was PA on 2/2/2018” no reclamation of the site had occurred. A corrective action date of “immediately” was imposed, however upon information and belief one or more corrective actions were not taken. Furthermore no Form 6 report of subsequent abandonment has been filed in violation of Rule 418.
8. NRG was previously issued a warning letter for the LEWTON COMPANY F UNIT 1 well on December 23, 2019 for failing to perform Mechanical Integrity Testing, with a corrective action deadline date of March 31, 2020. The Resource Group failed to perform the required corrective action, in violation of COGCC Rule 523.f.
9. NRG was previously issued a warning letter for the SHANNON-ROBERTS #1-A well on December 23, 2019 for failing to report monthly operations and failing to conduct an MIT. The corrective action deadline was 3/31/2020. Upon information and belief one or more required corrective actions was not taken in violation of Rule 523.f.
10. NRG was previously issued a warning letter for the RMPCO-UPRR-NICHOLS 1 on April 2, 2020 for failing to perform Bradenhead testing pursuant to Rule 207.b. The corrective action deadline was 4/17//2020. Upon information and belief one or more required corrective actions was not taken in violation of Rule 523.f.
11. NRG was subject to a Notice of Alleged Violation on October 5, 2018 for its Garcia 34-14 well in part for failure to conduct Mechanical Integrity Testing. The NOAV had a corrective action date of November 5, 2018. It does not appear that any corrective action was taken, in violation of COGCC Rule 523.f.
12. NRG was subject to a Notice of Alleged Violation on August 12, 2020 for failure to conduct Mechanical Integrity Testing. The NOAV had a corrective action date of October 11, 2020. It does not appear that any corrective action was taken, in violation of COGCC Rule 523.
13. NRG was subject to a Notice of Alleged Violation on January 14, 2020 for failure to conduct Mechanical Integrity Testing at the RMPCO-UPRR-Nichols 1 well. The NOAV had a corrective action date of February 14, 2020. It does not appear that any corrective action was taken, in violation of COGCC Rule 523.

14. The Colorado Oil and Gas Conservation Commission has \$75,000 in financial assurances from NRG. According to the Commission's active operator list, <https://drive.google.com/file/d/17GyEwZZ1KON6DCGBoRhrGL08fSUsofLJ/view>, NRG owns 12 wells, of which none are producing, a gas processing plant and a pit. Neither the plant (facility ID 423110) nor the pit (facility ID 116885) has ever been inspected according to COGCC records.

Natural Resource Group Inc. has now been the subject of multiple inspections (several dozen since 2016, with over 100 required corrective actions), warnings, and NOAVs pertaining to its ongoing and widespread lack of MIT performance and its failures to report production, as well as failure to perform environmental corrective actions identified through inspections by the COGCC. These previous NOAVs, warnings, and inspections have not resulted in compliance. WildEarth Guardians requests that the Commission (1) find that Resource Group 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

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