

1 UNITED STATES
2 ENVIRONMENTAL PROTECTION AGENCY
3 REGION 8

4 Docket No. SDWA-08-2019-0022

2019 JUN -3 PM 3: 37
FILED
EPA REGION VIII
HEARING CLERK

5
6
7 In the Matter of:)

8)
9 Crescent Point Energy U.S. Corp.,)

10)
11 Respondent.)

**COMPLAINT AND NOTICE OF
OPPORTUNITY FOR HEARING**

12)
13 Proceedings under Section 1423(c))

14 of the Safe Drinking Water Act)

15 42 U.S.C. 300h-2(c))
16

17 **INTRODUCTION**

- 18
19 1. This Complaint and Notice of Opportunity for Hearing is filed pursuant to
20 sections 1423(a)(2) and (c)(2) of the Public Health Service Act, also known as the
21 Safe Drinking Water Act (Act). 42 §§ U.S.C. 300h-2(a)(2), (c)(2). The
22 Environmental Protection Agency (EPA) regulations authorized by the Act are set
23 out in part 144 of title 40 of the Code of Federal Regulations (40 C.F.R. part 144),
24 and violations of permits or EPA regulations constitute violations of the Act. This
25 proceeding is governed by the Consolidated Rules of Practice Governing the
26 Administrative Assessment of Civil Penalties, Issuance of Compliance or
27 Corrective Action Orders and the Revocation, Termination or Suspension of
28 Permits (Rules of Practice), 40 C.F.R. part 22, a copy of which is enclosed.
29
30 2. Complainant is Suzanne J. Bohan, Director, Enforcement and Compliance
31 Assurance Division, EPA Region 8, who has been duly delegated the authority to
32 initiate this action.
33
34 3. Complainant alleges that Crescent Point Energy U.S. Corp (Respondent) has
35 violated the Act and proposes the issuance of an administrative order requiring
36 compliance with the Act and the assessment of a civil penalty.
37

38 **NOTICE OF OPPORTUNITY FOR A HEARING**

- 39
40 4. Pursuant to 42 U.S.C. § 300h-2(c)(3) and 40 C.F.R. § 22.15, Respondent has the
41 right to a public hearing before a presiding officer to contest any material fact in
42 this Complaint, the appropriateness of the proposed penalty, or to present the
43 grounds for any legal defense it may have.
44

- 1 5. To contest the Complaint and assert Respondent's right to a hearing, Respondent
2 must file a written answer (and one copy) with the Region 8 Hearing Clerk at the
3 following address:

4
5 Missy Haniewicz, Regional Hearing Clerk
6 U.S. EPA Region 8 (8ORC-IO)
7 1595 Wynkoop Street
8 Denver, CO 80202-1129
9

10 within 30 calendar days (see 40 C.F.R. §22.15(a)) of receiving this Complaint.
11 The answer must clearly admit, deny or explain the factual allegations of the
12 Complaint, the grounds for any defense, any disputed facts, and Respondent's
13 specific request for a public hearing. Please see section 22.15(b) of the Rules of
14 Practice for a complete description of what must be in the answer. **FAILURE TO**
15 **FILE AN ANSWER AND REQUEST FOR HEARING WITHIN 30**
16 **CALENDAR DAYS MAY WAIVE RESPONDENT'S RIGHT TO**
17 **CONTEST THE ALLEGATIONS OR PROPOSED PENALTY, AND**
18 **RESULT IN A DEFAULT JUDGMENT AND ASSESSMENT OF THE**
19 **PENALTY PROPOSED IN THE COMPLAINT, OR UP TO THE**
20 **MAXIMUM AUTHORIZED BY THE ACT.**

21 QUICK RESOLUTION

- 22
23
24 6. Respondent may pay the penalty amount proposed in this Complaint at which
25 point the EPA shall resolve this proceeding following the procedures described in
26 40 C.F.R. section 22.45(c)(3). Such action to make payment need not contain any
27 response to, or admission of, the allegations in this Complaint. Such action to
28 make payment constitutes a waiver of Respondent's right to contest the
29 allegations and to appeal the final order.
30

31 SETTLEMENT NEGOTIATIONS

- 32
33 7. The EPA encourages discussing whether cases can be settled through informal
34 settlement conferences. If Respondent wants to pursue the possibility of settling
35 this matter, or has any other questions, contact Mia Bearley, Enforcement
36 Attorney, at [1-800-227-8917; extension 6554 or 303-312-6554] or at
37 bearley.mia@epa.gov. **Please note that calling Ms. Bearley or requesting a**
38 **settlement conference does NOT delay the running of the 30-day period for**
39 **filing an answer and/or requesting a hearing.**
40

41 GENERAL ALLEGATIONS

42
43 The following general allegations apply to all times relevant to this action, and to
44 each count of this Complaint:
45

- 1 8. Respondent is incorporated in the State of Delaware and conducts oil and gas
2 production activities in the State of Utah. Respondent's principal office address is
3 555 17th Street, Suite# 1800, Denver, Colorado, 80202-3905.
4
- 5 9. Respondent is a "person" within the meaning of section 1401(12) of the Act,
6 42 U.S.C. § 300f(12).
7
- 8 10. The injection wells which are the subject of this Complaint penetrate known or
9 possible underground sources of drinking water (USDW).
10
- 11 11. The injection wells subject to this Complaint are listed in Attachment A and are
12 incorporated into this Complaint.
13
- 14 12. A summary list of the violations alleged is included as Attachment B and is
15 incorporated into this Complaint.
16
- 17 13. Pursuant to section 1422 of the Act, 42 U.S.C. § 300h-1(e), and 40 C.F.R. part
18 147 subpart TT, section 147.2253, the EPA administers the Underground
19 Injection Control (UIC) program for Class II wells in Indian country within the
20 State of Utah. Therefore, for purposes of 42 U.S.C. § 300h-2(a)(2), EPA has
21 primary enforcement authority for Class II wells in Indian country. The effective
22 date of the program is November 25, 1988. The program requirements are located
23 at 40 C.F.R. parts 124, 144, 146, 147, and 148.
24
- 25 14. Class II underground injection wells under the jurisdiction of the EPA are
26 authorized to operate either under an EPA-issued permit or under a rule. To be
27 eligible to operate under rule-authorization, a UIC well must be a Class II
28 enhanced oil recovery well and must have been such a well at the time the EPA
29 UIC program became effective. All other Class II wells must be authorized by an
30 EPA-issued permit. Enhanced oil recovery (EOR) injection wells inject for the
31 purpose of enhanced recovery of oil or natural gas. Salt water disposal (SWD)
32 injection wells are wells that inject fluids brought to the surface in connection
33 with natural gas storage operations, or conventional oil or natural gas production.
34 See 40 C.F.R. § 144.6(b).
35
- 36 15. The wells subject to this action are one hundred eleven (111) Class II EOR
37 injection wells and two (2) SWD injection wells. The wells are operated by
38 Respondent and are located in Duchesne and Uintah Counties, Utah, within the
39 exterior boundary of the Uintah & Ouray Indian Reservation. The EOR injection
40 wells are used by Respondent to enhance oil production in the Antelope Creek
41 oilfield. The SWD injection wells are used to dispose of produced water in the
42 Black Tail field and Antelope Creek field. The injection wells are authorized
43 under these three permits:
44
- 45 a. EPA Area Permit No. UT20736-00000 covers the EOR wells in the Antelope
46 Creek field;

- 1 b. EPA Permit No. UT22214-09376 covers the SWD well in the Black Tail
2 field; and
3 c. EPA Permit No. UT20497-03100 covers the SWD well in the Antelope Creek
4 field.
5

6 16. The EPA originally issued area permit UT20736-00000 on July 12, 1994. The
7 permit is issued for the operating lives of the wells it covers. On June 16, 2017,
8 the EPA transferred this area permit to Respondent, who became the Permittee
9 responsible for its compliance.
10

11 17. The EPA originally issued permit UT22214-09376 on May 2, 2012. The permit is
12 issued for the operating life of the well it covers. On June 16, 2017, the EPA
13 transferred this permit to Respondent, who became the Permittee responsible for
14 its compliance.
15

16 18. The EPA originally issued permit UT20497-03100 on April 12, 1990. On June
17 16, 2017, the EPA transferred this permit to Respondent, who became the
18 Permittee responsible for its compliance.
19

20 VIOLATIONS

21 COUNT I

22 Failure to Submit Annual Monitoring Reports

23
24 19. The UIC area permit UT20736-00000 at sections II (D)(1) through (4) requires
25 that Respondent must annually by February 15 submit a report of the previous
26 year's monitored and recorded information. At a minimum, for each injection
27 well, this report must contain recorded observations of injection pressure, annulus
28 pressure, flow rate, and cumulative injection volume.
29

30 20. The UIC area permit UT20736-00000 at sections II (D)(1) through (4) requires
31 that Respondent must annually by February 15 submit a report of the results of
32 sampled injected fluids analyzed for total dissolved solids, pH, specific
33 conductivity, and specific gravity.
34

35 21. The UIC permit UT22214-09376 at sections II (D)(1) through (4) and the permit's
36 Appendix D requires that Respondent must annually by February 15 submit a
37 report of the previous year's monitored and recorded information. At a minimum,
38 for each injection well, this report must contain recorded observations of injection
39 pressure, annulus pressure, flow rate, and cumulative injection volume.
40

41 22. The UIC permit UT22214-09376 at sections II (D)(1) through (4) and the permit's
42 Appendix D requires that Respondent must annually by February 15 submit a
43 report of the results of sampled injected fluids analyzed for total dissolved solids,
44 pH, specific conductivity, and specific gravity.
45

- 1 23. The UIC permit UT20497-03100 at sections II (D)(1) through (4) requires that
2 Respondent must annually by February 15 submit a report of the previous year's
3 monitored and recorded information. At a minimum, for each injection well, this
4 report must contain recorded observations of injection pressure, annulus pressure,
5 flow rate, and cumulative injection volume.
6
- 7 24. The UIC permit UT20497-03100 at sections II (D)(1) through (4) requires that
8 Respondent must annually by February 15 submit a report of the results of
9 quarterly sampled injected fluids analyzed for total dissolved solids, major ions,
10 pH, specific conductivity, and specific gravity.
11
- 12 25. Each year, prior to the February 15 due date, the EPA sends courtesy reminder
13 letters to all Class II well operators reminding operators of the obligation to
14 timely submit these annual monitoring reports for each injection well. On January
15 16, 2018, the EPA sent an email to Respondent as a reminder of the February 15,
16 2018, deadline for submission of the 2017 annual monitoring reports.
17
- 18 26. The EPA communicated with Respondent four more times, seeking to obtain the
19 2017 monitoring reports. These communications are listed below:
20
- 21 • a March 6, 2018, phone call from the EPA's Don Breffle;
 - 22 • a May 7, 2018, Notice of Violation letter, from the EPA's Water Technical
23 Enforcement Program Director, Arturo Palomares;
 - 24 • a May 10, 2018, phone call from the EPA's Nathan Wiser; and
 - 25 • a July 24, 2018, email from the EPA's Don Breffle.
26
- 27 27. As of the date of this Complaint, Respondent has not submitted any of the
28 required 2017 annual monitoring reports for the 113 Class II injection wells
29 required by the permits. Additionally, despite an EPA December 27, 2018,
30 courtesy reminder and an April 9, 2019, Notice of Violation, Respondent failed to
31 submit two of the required 2018 annual monitoring reports, due on February 15,
32 2019, until May 1, 2019, and even then one of the 2018 reports was incomplete.
33
- 34 28. Respondent's failure to timely submit the annual monitoring reports for 113 Class
35 II injection wells covered under the three EPA permits are violations of section
36 II(D) in each of the three UIC permits specified in paragraph 15 and are therefore
37 violations of part C of the Act. See Attachment B to this Complaint, which lists
38 these 113 annual monitoring report violations, as well as the date by which each
39 annual monitoring report was due. These 113 wells are designated with the letter
40 "A" in the Attachment B.
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COUNT II

Mechanical Integrity Testing (Part I) – Overdue Standard Annulus Pressure Test

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5 29. The UIC regulations at 40 C.F.R. § 146.8 define mechanical integrity. Mechanical
6 integrity consists of two parts: Part I (internal) mechanical integrity and Part II
7 (external) mechanical integrity. The regulation at 40 C.F.R. § 146.8(a)(1) defines
8 Part I mechanical integrity as no significant leak from the well's tubing, packer or
9 casing. The regulation at 40 C.F.R. § 146.8(a)(2) defines Part II mechanical
10 integrity as no significant fluid movement into a USDW through vertical channels
11 adjacent to the injection wellbore.
12
- 13 30. The EPA permit UT20736-00000, at section II(C)(3) requires Respondent to
14 demonstrate internal mechanical integrity of the injection wells covered under the
15 permit at least every five years, and to submit results of such mechanical integrity
16 tests to the EPA no later than 60 days after test completion.
17
- 18 31. For nine of the EOR injection wells covered under the permit UT20736-00000, it
19 has been more than five years since the last demonstration of internal mechanical
20 integrity. As of the date of this Complaint, the EPA has not received mechanical
21 integrity test results from these nine injection wells.
22
- 23 32. For the well covered under the permit UT22214-09376, at section II(B) and the
24 permit's Appendix B, Respondent must demonstrate internal mechanical integrity
25 at least every five years by conducting a standard annulus pressure test of the
26 annulus between the well's injection tubing and production casing. The permit at
27 section II(B)(1) requires submission to the EPA of any mechanical integrity test
28 within 60 days after the test is complete.
29
- 30 33. For the well covered under the permit UT22214-09376, the last demonstration of
31 internal mechanical integrity occurred on July 12, 2012. Another internal
32 mechanical integrity demonstration was due by July 12, 2017. As of the date of
33 this Complaint, the EPA has received no further internal mechanical integrity test
34 results.
35
- 36 34. Due to its failure to timely conduct a demonstration of the internal mechanical
37 integrity of nine of the wells as described in paragraphs 30 through 33,
38 Respondent is in violation of UIC permit UT20736-00000, section II(C) and UIC
39 permit UT22214-09376, section II(B), and therefore is in violation of part C of
40 the Act. See Attachment B to this Complaint, which lists these ten internal
41 mechanical integrity violations, as well as the date by which each mechanical
42 integrity test was due. These 10 wells are designated with the letter "B" in the
43 Attachment B.
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COUNT III

Mechanical Integrity Testing (Part II) – Overdue External Testing

- 4 35. Paragraph 29 provides the regulatory definition of the two parts of mechanical
5 integrity: internal and external. Paragraphs 29 through 34 refer to internal (Part I)
6 mechanical integrity issues. External (Part II) mechanical integrity is normally
7 demonstrated by the submission of one or more cement bond logs (CBLs) run in a
8 Class II injection well that show, within the geologic confining zone, good cement
9 bonding between the outer well casing and the wellbore. Good bonding is usually
10 determined by calculating a cement bond index equal to or exceeding 0.80 and
11 spanning a minimum distance behind the production casing within the confining
12 zone. When CBLs fail to demonstrate external mechanical integrity, the EPA
13 requires that a different log, such as a temperature, noise, oxygen activation, or
14 under certain conditions, a radioactive tracer survey (RTS) log, shall be run on a
15 frequency of no less than every five years.
- 16
- 17 36. Since originally issued in 1994, from time to time the EPA authorized additional
18 Class II EOR injection wells under area permit UT20736-00000, seven of which
19 failed to meet the cement bond index standard described in paragraph 35.
- 20
- 21 • For well UT20736-06602, this requirement took effect on February 22, 2006;
 - 22 • For well UT20736-06603, this requirement took effect on October 14, 2005;
 - 23 • For well UT20736-06604, this requirement took effect on October 5, 2005;
 - 24 • For well UT20736-06700, this requirement took effect on April 17, 2006;
 - 25 • For well UT20736-07118, this requirement took effect on March 12, 2007;
 - 26 • For well UT20736-07119, this requirement took effect on June 1, 2007; and
 - 27 • For well UT20736-07416, this requirement took effect on January 3, 2007.

28

29 For these seven wells, the EPA required a separate external mechanical integrity
30 log to be conducted at least once every five years to demonstrate external
31 mechanical integrity. The last external mechanical integrity log conducted at any
32 Class II well in the Antelope Creek field happened in 2006. Respondent's failures
33 to timely conduct external mechanical integrity logs at these Class II wells are
34 violations of UIC permit UT20736-00000, and therefore part C of the Act. See
35 Attachment B to this Complaint where these external mechanical integrity
36 violations are listed. These seven wells are designated with the letter "C" in the
37 Attachment B.

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COUNT IV

Failure to Report Loss of Mechanical Integrity

- 42 37. On October 10, 2018, the EPA received an email from Respondent which stated
43 that it had repaired the injection well Ute Tribal #04-02 covered by area permit
44 UT20736-00000; demonstrated internal mechanical integrity on September 11,
45 2018; and sought authorization to resume injection. Respondent provided no prior
46 notice that this injection well had lost internal mechanical integrity.

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2 38. Information in the October 10, 2018, email from Respondent contained evidence
3 that the Ute Tribal #04-02 well had lost mechanical integrity at least as early as
4 September 4, 2018.
5
6 39. Area permit UT20736-00000 at section II(C)(3) requires Respondent to notify the
7 EPA within 24 hours and to follow up with a written report within five days after
8 a loss of mechanical integrity.
9
10 40. On October 11, 2018, the EPA granted Respondent's request to resume injection
11 and reminded Respondent of the obligation to notify the EPA about an injection
12 well losing mechanical integrity.
13
14 41. The Ute Tribal #04-02 well repair and demonstration of internal mechanical
15 integrity occurred on September 11, 2018, and the well workover report indicates
16 the loss of internal mechanical integrity on September 4, 2018. Respondent's
17 failure to notify the EPA of the loss of mechanical integrity at this well within 24
18 hours after losing mechanical integrity and to follow up with a written report
19 within five days is a violation of the area permit at section II(C)(3) and therefore
20 the Act. See Attachment B to this Complaint where this notification violation is
21 listed. This well is designated with the letter "D" in the Attachment B.
22

COUNT V

Injecting Over the Maximum Allowable Pressure Limit

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26 42. The Ute Tribal #29-12 injection well is covered by the EPA area permit
27 UT20736-00000. This area permit, at section II (C)(5) establishes wellhead
28 maximum allowable injection pressures (MAIPs) that are individually tailored to
29 each injection well based on a fracture gradient, injection fluid density and the
30 well's depth to the injection zone. MAIPs are established to ensure fracturing the
31 injection zone does not occur. The current Ute Tribal #29-12 injection MAIP limit
32 is 1710 psi.
33
34 43. During a May 22, 2018, routine inspection EPA UIC inspectors observed the Ute
35 Tribal #29-12 Class II injection well to be actively injecting. Inspectors measured
36 a wellhead injection tubing pressure of 1713 psi. See Attachment B to this
37 Complaint where this MAIP violation is listed. On the day of this inspection,
38 Respondent was in violation of UIC area permit UT20736-00000, section II
39 (C)(5) and therefore the Act. This well is designated with the letter "E" in the
40 Attachment B.
41

COUNT VI

Failure to Plug and Abandon or Demonstrate Non-Endangerment

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45 44. The EPA area permit UT20736-00000, at section II (E)(3), establishes
46 requirements at covered Class II injection wells that have ceased injection

1 activities for two years or longer, popularly referred to as “temporarily
2 abandoned” injection wells. This section of the area permit requires that any
3 temporarily abandoned injection well shall be plugged and abandoned, unless
4 notice is made to the EPA that describes a future intended use for the well and a
5 demonstration that the well will not endanger USDWs during the temporary
6 abandonment period. The EPA will accept a “passing” internal mechanical
7 integrity test as a means to demonstrate that a temporarily abandoned injection
8 well will not endanger USDWs, and such mechanical integrity demonstrations
9 would need to be made every two years the well remains temporarily abandoned.

- 10
11 45. For the calendar years 2015-2016, the monitoring reports submitted to the EPA
12 indicate no injection had occurred at three injection wells and, therefore, that
13 these wells had been temporarily abandoned. The latest “passing” internal
14 mechanical integrity tests for these wells are more than two years old. In addition,
15 no notifications referred to in paragraph 44 have been made to the EPA about
16 these temporarily abandoned injection wells. Respondent’s failure to either plug
17 and abandon or demonstrate non-endangerment at these injection wells are
18 violations of the UIC area permit UT20736-00000, section II (E)(3) and therefore
19 the Act. See Attachment B to this Complaint where these failures to plug or
20 demonstrate non-endangerment violations are listed. The three wells are
21 designated with the letter “F” in the Attachment B.
22
23

24 COMPLIANCE AND CIVIL PENALTY ASSESSMENT

- 25
26 46. The Act, as amended, authorize the Administrator of the EPA to issue orders to
27 require compliance with the Act and assess civil penalties for the violations
28 alleged in this complaint. 42 U.S.C. §§ 300h-2(a)(2), (c)(2). The Act authorizes
29 penalties of not more than \$5,000 per day for each violation, up to a maximum
30 civil administrative penalty of \$125,000. The Federal Civil Penalties Inflation
31 Adjustment Act of 1990, as amended by the Debt Collection Improvement Act of
32 1996, requires the EPA to adjust statutory penalty amounts to account for
33 inflation. EPA’s Civil Monetary Penalty Inflation Adjustment Rule establishes
34 \$57,317 as the maximum penalty per day of violation, up to a maximum total civil
35 administrative penalty of \$286,586.00, for actions under 42 U.S.C. § 300h-
36 2(c)(2).
37
38 47. The Act requires the EPA to take into account the following factors in assessing a
39 civil penalty: the seriousness of the violation, the economic benefit resulting from
40 the violation, any history of such violations, any good-faith efforts to comply, the
41 economic impact on Respondent, and other matters as justice may require. 42
42 U.S.C. §300h-2(c)(4)(B).
43
44 48. Complainant proposes an order that requires Respondent to correct all alleged
45 violations and return to compliance with the Act within 90 days of the order.
46

1 49. Complainant has considered the statutory penalty factors with respect to all
2 violations alleged in this complaint, and the specific facts of this case and
3 proposes that Respondent pay a total penalty of \$67,390.00 for the violations
4 alleged in this Complaint.
5

6 **PAYMENT OF PENALTY**
7

8 50. Respondent's payment of the penalty shall be made using any method provided
9 on the following website, <https://www.epa.gov/financial/makepayment>. Further,
10 Respondent shall:

- 11
12 (a) identify each payment with this Complaint's Docket Number; and
13 (b) within 24 hours of payment, mail "proof of payment" (as applicable, a copy of
14 the check, confirmation of credit card or debit card payment, confirmation of wire
15 or automated clearinghouse transfer, and any other information required to
16 demonstrate that payment has been made in the amount due, and identified with
17 this Complaint's Docket Number) to:

18
19 Nathan Wiser, Technical Enforcement Program
20 U.S. EPA Region 8 (8ENF-WSD)
21 1595 Wynkoop Street
22 Denver, CO 80202-1129
23

24 and

25
26 Missy Haniewicz, Regional Hearing Clerk
27 U.S. EPA Region 8 (8ORC-IO)
28 1595 Wynkoop Street
29 Denver, CO 80202-1129.

30 51. The provisions of this Complaint shall apply to and be binding upon Respondent,
31 its officers, directors, agents, servants, employees, and successors or assigns.
32

33 52. As part of this proceeding, the EPA shall provide the public with notice of this
34 Complaint to allow a reasonable opportunity for citizens to comment on the
35 matter, as well as the opportunity for such citizens to present evidence in the
36 event a hearing is held. 42 U.S.C. § 300h-2(c)(3).
37

38 53. The presiding officer is not bound by the penalty proposed by the EPA, and may
39 assess a penalty above the proposed amount, up to \$286,586.00, as authorized in
40 the Act, as amended.
41

42 54. This Complaint does not constitute a waiver, suspension, or modification of the
43 requirements of any applicable provision of the Act or the UIC regulations
44 implementing the Act, which remain in full force and effect. Issuance of this
45 Complaint is not an election by the EPA to forego any civil or any criminal action
46 otherwise authorized under the Act.

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By:



Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

Date: June 3, 2019

Attachment A – List of Respondent’s Wells in Violation

EPA Well ID	Well Name	Well Type	API Number
UT20736-04356	Ute Tribal 04-02	Enhanced Recovery (2R)	43-013-31656
UT20736-04322	Ute Tribal 04-01	Enhanced Recovery (2R)	43-013-30762
UT20497-03100	Ute Tribal 04-07 (2-4)	Salt Water Disposal (2D)	43-013-30879
UT20736-04434	Ute Tribal 03-14	Enhanced Recovery (2R)	43-013-31097
UT20736-04636	Ute Tribal 04-13	Enhanced Recovery (2R)	43-013-30848
UT20736-04635	Ute Tribal 04-11	Enhanced Recovery (2R)	43-013-30878
UT20736-04327	Ute Tribal 05-16	Enhanced Recovery (2R)	43-013-31527
UT20736-04328	Ute Tribal 04-05	Enhanced Recovery (2R)	43-013-31462
UT20736-04234	Ute Tribal 05-10 (old 3-5E3)	Enhanced Recovery (2R)	43-013-30938
UT20736-04324	Ute Tribal 05-08	Enhanced Recovery (2R)	43-013-31306
UT20736-04553	Ute Tribal 16-12	Enhanced Recovery (2R)	43-013-31800
UT20736-06699	Ute Tribal 17-01	Enhanced Recovery (2R)	43-013-30790
UT20736-04551	Ute Tribal 16-04	Enhanced Recovery (2R)	43-013-31789
UT20736-06601	Ute Tribal 16-03	Enhanced Recovery (2R)	43-013-31855
UT20736-06698	Ute Tribal 09-15	Enhanced Recovery (2R)	43-013-31165
UT20736-04412	Ute Tribal 16-02	Enhanced Recovery (2R)	43-013-31821
UT20736-06600	Ute Tribal 16-01	Enhanced Recovery (2R)	43-013-31821
UT20736-06602	Ute Tribal 16-05	Enhanced Recovery (2R)	43-013-31790
UT20736-04546	Ute Tribal 16-06	Enhanced Recovery (2R)	43-013-31710
UT20736-06603	Ute Tribal 16-07	Enhanced Recovery (2R)	43-013-31854
UT20736-04414	Ute Tribal 16-08	Enhanced Recovery (2R)	43-013-31853
UT20736-04503	Ute Tribal 16-10	Enhanced Recovery (2R)	43-013-31851
UT20736-06604	Ute Tribal 16-09	Enhanced Recovery (2R)	43-013-31582
UT20736-04640	Ute Tribal 15-12	Enhanced Recovery (2R)	43-013-31892
UT20736-04418	Ute Tribal 16-16	Enhanced Recovery (2R)	43-013-30804
UT20736-06607	Ute Tribal 16-15	Enhanced Recovery (2R)	43-013-31822
UT20736-04393	Ute Tribal 16-11	Enhanced Recovery (2R)	43-013-31799
UT20736-06605	Ute Tribal 16-13	Enhanced Recovery (2R)	43-013-31166
UT20736-07114	Ute Tribal 20-02	Enhanced Recovery (2R)	43-013-30764
UT20736-06606	Ute Tribal 16-14	Enhanced Recovery (2R)	43-013-31791
UT20736-06521	Ute Tribal 21-04	Enhanced Recovery (2R)	43-013-31735

UT20736-04363	Ute Tribal 21-03	Enhanced Recovery (2R)	43-013-31752
UT20736-06477	Ute Tribal 21-02	Enhanced Recovery (2R)	43-013-31749
UT20736-06478	Ute Tribal 21-05	Enhanced Recovery (2R)	43-013-31750
UT20736-04388	Ute Tribal 21-06	Enhanced Recovery (2R)	43-013-31731
UT20736-07116	Ute Tribal 21-07	Enhanced Recovery (2R)	43-013-31751
UT20736-07117	Ute Tribal 21-10	Enhanced Recovery (2R)	43-013-31748
UT20736-04365	Ute Tribal 21-11	Enhanced Recovery (2R)	43-013-31740
UT20736-06479	Ute Tribal 21-12	Enhanced Recovery (2R)	43-013-31741
UT20736-04522	Ute Tribal 21-15	Enhanced Recovery (2R)	43-013-31756
UT20736-06481	Ute Tribal 21-14	Enhanced Recovery (2R)	43-013-31742
UT20736-07118	Ute Tribal 28-04	Enhanced Recovery (2R)	43-013-31692
UT20736-04410	Ute Tribal 28-05A	Enhanced Recovery (2R)	43-013-31709
UT20736-07123	Ute Tribal 29-08	Enhanced Recovery (2R)	43-013-31693
UT20736-04325	Ute Tribal 29-08A	Enhanced Recovery (2R)	43-013-31305
UT20736-07120	Ute Tribal 28-11	Enhanced Recovery (2R)	43-013-31575
UT20736-07119	Ute Tribal 28-05	Enhanced Recovery (2R)	43-013-30802
UT20736-04380	Ute Tribal 28-06	Enhanced Recovery (2R)	43-013-31594
UT20736-04389	Ute Tribal 28-03	Enhanced Recovery (2R)	43-013-31675
UT20736-04233	Ute Tribal 29-09 (old 1-29)	Enhanced Recovery (2R)	43-013-30763
UT20736-04475	Ute Tribal 29-16	Enhanced Recovery (2R)	43-013-30849
UT20736-07126	Ute Tribal 29-15	Enhanced Recovery (2R)	43-013-31530
UT20736-04641	Ute Tribal 29-14	Enhanced Recovery (2R)	43-013-32201
UT20736-07124	Ute Tribal 29-10	Enhanced Recovery (2R)	43-013-31475
UT20736-07125	Ute Tribal 29-11	Enhanced Recovery (2R)	43-013-31714
UT20736-04523	Ute Tribal 29-12	Enhanced Recovery (2R)	43-013-31797
UT20736-04451	Ute Tribal 30-09	Enhanced Recovery (2R)	43-013-31798
UT20736-07122	Ute Tribal 29-07	Enhanced Recovery (2R)	43-013-30939
UT20736-07121	Ute Tribal 29-02	Enhanced Recovery (2R)	43-013-32199
UT20736-04619	Ute Tribal 29-01	Enhanced Recovery (2R)	43-013-32198
UT20736-06480	Ute Tribal 21-13	Enhanced Recovery (2R)	43-013-30883
UT20736-04541	Ute Tribal 29-03	Enhanced Recovery (2R)	43-013-31842
UT20736-06483	Ute Tribal 29-05	Enhanced Recovery (2R)	43-013-31796
UT20736-04416	Ute Tribal 29-06	Enhanced Recovery (2R)	43-013-30850

UT20736-06482	Ute Tribal 29-04	Enhanced Recovery (2R)	43-013-30851
UT20736-04494	Ute Tribal 20-13	Enhanced Recovery (2R)	43-013-31981
UT20736-04540	Ute Tribal 20-14	Enhanced Recovery (2R)	43-013-31982
UT20736-07113	Ute Tribal 19-16	Enhanced Recovery (2R)	43-013-30803
UT20736-04525	Ute Tribal 30-14	Enhanced Recovery (2R)	43-013-31908
UT20736-04446	Ute Tribal 30-15	Enhanced Recovery (2R)	43-013-31896
UT20736-04417	Ute Tribal 30-16	Enhanced Recovery (2R)	43-013-31897
UT20736-07417	Ute Tribal 29-13	Enhanced Recovery (2R)	43-013-32200
UT20736-04524	Ute Tribal 30-10	Enhanced Recovery (2R)	43-013-31895
UT20736-04359	Ute Tribal 30-08	Enhanced Recovery (2R)	43-013-31734
UT20736-07418	Ute Tribal 30-07	Enhanced Recovery (2R)	43-013-30852
UT20736-04362	Ute Tribal 30-01	Enhanced Recovery (2R)	43-013-31707
UT20736-07416	Ute Tribal 30-02	Enhanced Recovery (2R)	43-013-31823
UT20736-04496	Ute Tribal 19-15	Enhanced Recovery (2R)	43-013-31968
UT20736-04536	Ute Tribal 19-09	Enhanced Recovery (2R)	43-013-31794
UT20736-04381	Ute Tribal 08-07	Enhanced Recovery (2R)	43-013-31691
UT20736-04201	Ute Tribal 08-04 (old 1-8)	Enhanced Recovery (2R)	43-013-30759
UT20736-04637	Ute Tribal 07-11	Enhanced Recovery (2R)	43-013-31928
UT20736-04495	Ute Tribal 07-14	Enhanced Recovery (2R)	43-013-30788
UT20736-06701	Ute Tribal 18-03b	Enhanced Recovery (2R)	43-013-31528
UT20736-07414	Ute Tribal 7-15	Enhanced Recovery (2R)	43-013-31858
UT20736-04203	Ute Tribal 08-06 (old 5-8)	Enhanced Recovery (2R)	43-013-31307
UT20736-04415	Ute Tribal 07-09	Enhanced Recovery (2R)	43-013-31900
UT20736-04419	Ute Tribal 07-16	Enhanced Recovery (2R)	43-013-31463
UT20736-06700	Ute Tribal 18-01	Enhanced Recovery (2R)	43-013-30761
UT20736-04202	Ute Tribal 18-02 (old 4-18)	Enhanced Recovery (2R)	43-013-31099
UT20736-04520	Ute Tribal 18-11	Enhanced Recovery (2R)	43-013-31782
UT20736-06680	Ute Tribal 18-12	Enhanced Recovery (2R)	43-013-31783
UT20736-06678	Ute Tribal 18-06	Enhanced Recovery (2R)	43-013-31781
UT20736-04472	Ute Tribal 18-05	Enhanced Recovery (2R)	43-013-31534
UT20736-04355	Ute Tribal 18-08	Enhanced Recovery (2R)	43-013-30881
UT20736-04204	Ute Tribal 18-09 (old 5-18)	Enhanced Recovery (2R)	43-013-31180
UT20736-06677	Ute Tribal 18-07 (old 7-18)	Enhanced Recovery (2R)	43-013-31533

UT20736-06679	Ute Tribal 18-10	Enhanced Recovery (2R)	43-013-31595
UT20736-07415	Ute Tribal 18-16	Enhanced Recovery (2R)	43-013-31747
UT20736-04502	Ute Tribal 19-01	Enhanced Recovery (2R)	43-013-31964
UT20736-04491	Ute Tribal 19-07	Enhanced Recovery (2R)	43-013-31965
UT20736-04391	Ute Tribal 18-15	Enhanced Recovery (2R)	43-013-31753
UT20736-07536	Ute Tribal 18-14	Enhanced Recovery (2R)	43-013-31746
UT20736-04392	Ute Tribal 18-13b	Enhanced Recovery (2R)	43-013-31784
UT20736-04390	Ute Tribal 19-03	Enhanced Recovery (2R)	43-013-31792
UT20736-04535	Ute Tribal 19-05	Enhanced Recovery (2R)	43-013-31793
UT20736-04521	Ute Tribal 19-11	Enhanced Recovery (2R)	43-013-31967
UT20736-04618	Ute Tribal 19-13	Enhanced Recovery (2R)	43-013-31894
UT20736-04423	Ute Tribal 33-16-D3	Enhanced Recovery (2R)	43-013-31938
UT20736-04420	Ute Tribal 33-14-D3	Enhanced Recovery (2R)	43-013-31936
UT20736-04421	Ute Tribal 33-10-D3	Enhanced Recovery (2R)	43-013-31935
UT20736-04422	Ute Tribal 33-08-D3	Enhanced Recovery (2R)	43-013-31956
UT22214-09376	SWD 9-36 BTR	Salt Water Disposal (2D)	43-013-50646

Attachment B – List of Respondent’s Well Violations

Label	EPA Well ID	Well Name	Violation	Begin date	End date
A	UT20497-03100	Ute Tribal 04-07 (2-4)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04201	Ute Tribal 08-04 (old 1-8)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04202	Ute Tribal 18-02 (old 4-18)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04203	Ute Tribal 08-06 (old 5-8)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04204	Ute Tribal 18-09 (old 5-18)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04233	Ute Tribal 29-09 (old 1-29)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04234	Ute Tribal 05-10 (old 3-5E3)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04322	Ute Tribal 04-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04324	Ute Tribal 05-08	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04325	Ute Tribal 29-08A	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04327	Ute Tribal 05-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04328	Ute Tribal 04-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04355	Ute Tribal 18-08	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04356	Ute Tribal 04-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04359	Ute Tribal 30-08	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04362	Ute Tribal 30-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04363	Ute Tribal 21-03	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04365	Ute Tribal 21-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04380	Ute Tribal 28-06	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04381	Ute Tribal 08-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04388	Ute Tribal 21-06	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04389	Ute Tribal 28-03	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04390	Ute Tribal 19-03	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04391	Ute Tribal 18-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*

A	UT20736-04392	Ute Tribal 18-13b	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04393	Ute Tribal 16-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04410	Ute Tribal 28-05A	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04412	Ute Tribal 16-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04414	Ute Tribal 16-08	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04415	Ute Tribal 07-09	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04416	Ute Tribal 29-06	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04417	Ute Tribal 30-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04418	Ute Tribal 16-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04419	Ute Tribal 07-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04420	Ute Tribal 33-14-D3	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04421	Ute Tribal 33-10-D3	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04422	Ute Tribal 33-08-D3	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04423	Ute Tribal 33-16-D3	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04434	Ute Tribal 03-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04446	Ute Tribal 30-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04451	Ute Tribal 30-09	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04472	Ute Tribal 18-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04475	Ute Tribal 29-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04491	Ute Tribal 19-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04494	Ute Tribal 20-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04495	Ute Tribal 07-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04496	Ute Tribal 19-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04502	Ute Tribal 19-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04503	Ute Tribal 16-10	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*

A	UT20736-04520	Ute Tribal 18-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04521	Ute Tribal 19-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04522	Ute Tribal 21-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04523	Ute Tribal 29-12	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04524	Ute Tribal 30-10	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04525	Ute Tribal 30-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04535	Ute Tribal 19-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04536	Ute Tribal 19-09	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04540	Ute Tribal 20-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04541	Ute Tribal 29-03	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04546	Ute Tribal 16-06	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04551	Ute Tribal 16-04	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04553	Ute Tribal 16-12	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04618	Ute Tribal 19-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04619	Ute Tribal 29-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04635	Ute Tribal 04-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04636	Ute Tribal 04-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04637	Ute Tribal 07-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04640	Ute Tribal 15-12	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-04641	Ute Tribal 29-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06477	Ute Tribal 21-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06478	Ute Tribal 21-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06479	Ute Tribal 21-12	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06480	Ute Tribal 21-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06481	Ute Tribal 21-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*

A	UT20736-06482	Ute Tribal 29-04	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06483	Ute Tribal 29-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06521	Ute Tribal 21-04	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06600	Ute Tribal 16-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06601	Ute Tribal 16-03	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06602	Ute Tribal 16-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06603	Ute Tribal 16-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06604	Ute Tribal 16-09	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06605	Ute Tribal 16-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06606	Ute Tribal 16-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06607	Ute Tribal 16-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06677	Ute Tribal 18-07 (old 7-18)	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06678	Ute Tribal 18-06	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06679	Ute Tribal 18-10	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06680	Ute Tribal 18-12	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06698	Ute Tribal 09-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06699	Ute Tribal 17-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06700	Ute Tribal 18-01	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-06701	Ute Tribal 18-03b	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07113	Ute Tribal 19-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07114	Ute Tribal 20-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07116	Ute Tribal 21-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07117	Ute Tribal 21-10	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07118	Ute Tribal 28-04	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07119	Ute Tribal 28-05	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*

A	UT20736-07120	Ute Tribal 28-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07121	Ute Tribal 29-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07122	Ute Tribal 29-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07123	Ute Tribal 29-08	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07124	Ute Tribal 29-10	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07125	Ute Tribal 29-11	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07126	Ute Tribal 29-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07414	Ute Tribal 7-15	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07415	Ute Tribal 18-16	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07416	Ute Tribal 30-02	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07417	Ute Tribal 29-13	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07418	Ute Tribal 30-07	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20736-07536	Ute Tribal 18-14	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT22214-09376	SWD 9-36 BTR	Failure to Timely Report Annual Mon Report 2017	2/15/2018	On-Going*
A	UT20497-03100	Ute Tribal 04-07 (2-4)	Failure to Timely Report Annual Mon Report 2018	2/15/2019	5/1/2019
A	UT22214-09376	SWD 9-36 BTR	Failure to Timely Report Annual Mon Report 2018	2/15/2019	5/1/2019 but incomplete
B	UT20736-04355	Ute Tribal 18-08	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	1/16/2018	On-Going*
B	UT20736-04381	Ute Tribal 08-07	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	10/16/2017	On-Going*
B	UT20736-04390	Ute Tribal 19-03	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	5/2/2016	On-Going*
B	UT20736-04412	Ute Tribal 16-02	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	3/17/2018	On-Going*
B	UT20736-04421	Ute Tribal 33-10-D3	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	7/20/2018	On-Going*
B	UT20736-04422	Ute Tribal 33-08-D3	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	1/19/2019	On-Going*
B	UT20736-06603	Ute Tribal 16-07	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	1/17/2016	On-Going*
B	UT20736-06606	Ute Tribal 16-14	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	4/6/2018	On-Going*
B	UT20736-06607	Ute Tribal 16-15	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	1/17/2016	On-Going*

B	UT22214-09376	SWD 9-36 BTR	Overdue Internal Mechanical Integrity Test Part I - Annulus Pressure Test	7/12/2017	On-Going*
C	UT20736-06602	Ute Tribal 16-05	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-06603	Ute Tribal 16-07	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-06604	Ute Tribal 16-09	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-06700	Ute Tribal 18-01	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-07118	Ute Tribal 28-04	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-07119	Ute Tribal 28-05	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
C	UT20736-07416	Ute Tribal 30-02	Overdue External Mechanical Integrity Test Part II - Logs	9/1/2013	On-Going*
D	UT20736-04356	Ute Tribal 04-02	Failure to Timely Report Mechanical Integrity Loss	9/4/2018	10/10/2018
E	UT20736-04523	Ute Tribal 29-12	Injection over Maximum Allowable Injection Pressure Limit	5/22/2018	5/23/2018
F	UT20736-06479	Ute Tribal 21-12	Fail to Plug & Abandon or Demonstrate Non-Endangerment	5/3/2018	On-Going*
F	UT20736-06678	Ute Tribal 18-06	Fail to Plug & Abandon or Demonstrate Non-Endangerment	2/4/2018	On-Going*
F	UT20736-07122	Ute Tribal 29-07	Fail to Plug & Abandon or Demonstrate Non-Endangerment	6/28/2018	On-Going*
*For on-going violations, the violation duration for penalty calculation purposes used is May 1, 2019.					