

2020 Well Violations Summary

Of the total 9,363 violations issued in 2020, 2,704 were administrative violations and 6,659 were environmental health and safety violations.

Of the 2,704 administrative violations, 364 were not documented to specific conventional or unconventional wells, while 2,272 were documented to conventional wells and 68 were documented to unconventional wells. The highest incident rates of these categories of violations are characterized as follows:

- Of the 364 administrative violations that were not documented to a specific conventional or unconventional well, 125 were for failure to submit an annual production report; 123 were for failure to submit an annual mechanical integrity report; 33 were for failure to submit a Notice of Termination; 30 were for failure to include required drawings and narratives for erosion and sedimentation control plans. The remaining violations were distributed among 24 other violation categories.
- Of the 2,272 administrative violations documented to conventional wells, 667 were for failure to submit an annual mechanical integrity report; 702 were for failure to submit an annual production report; 445 were for failure to install a permanent permit number on a completed well; 212 were for failure to post operator contact information during the preparation and operation of a well. The remaining violations were distributed among 20 other violation categories.
- The 68 administrative violations documented to unconventional wells were fairly evenly distributed among 22 violation categories.

Of the 6,659 environmental health and safety violations, 3,936 were not documented to a specific conventional or unconventional well, while 1,695 were documented to conventional wells and 1,028 were documented to unconventional wells. The highest incident rates of these categories of violations are characterized as follows:

- Of the 3,936 environmental health and safety violations that were not documented to a specific conventional or unconventional well, 2,103 were for failure to comply with terms and conditions of an Erosion and Sedimentation Control General Permit; 297 were for failure to install, maintain, repair or remove oil and gas gathering pipelines as required by state laws; 223 were for failure to temporarily stabilize a well site; 194 were for failure to permanently stabilize a well site; 168 were for conducting a regulated activity without a permit or contrary to an issued permit. The remaining violations were distributed among 88 other violation categories.
- Of the 1,695 health and safety violations that were documented to conventional wells, 453 were for failure to plug the well upon abandoning it; 90 were for managing residual waste without a permit or in a manner that was unauthorized by state law. The remaining health and safety violations were distributed among 60 other violation categories.
- The 1,028 health and safety violations documented to unconventional wells, 140 failed to report and/or correct the improper cementing of a well within prescribed timeframes or submit a plan

to correct the defect within prescribed timeframes; 107 were for conducting casing and cementing activities that failed to prevent the migration of gas or other fluids into sources of fresh groundwater or to prevent pollution or diminution of fresh groundwater; 105 were for managing residual waste without a permit or in a manner that was unauthorized by state law; 82 were for conducting a regulated activity without a permit or contrary to an issued permit; 54 were for failure to prevent gas, oil, brine completion/servicing fluids or other materials from below the casing seat from entering fresh groundwater, and prevent pollution or diminution of fresh groundwater; 50 were for failure to prevent gas flow in the well annulus. The remaining health and safety violations were distributed among 74 other violation categories