



02470293

operator #5

MEMORANDUM

TO: John Stowell, Dennis Bicknell
FROM: Jim Kenney *SSK*
DATE: 8 December 89
RE: Cathodic Protection Well Developments

Yesterday, Reiner Haubold (spelling?) with the State Engineers office visited us. The bottom line of the conversation was that cathodic protection wells are regulated by the State Engineer.

Attached is a copy of the REVISED AND AMENDED RULES AND REGULATIONS OF THE BOARD OF EXAMINERS OF WATER WELL CONSTRUCTION AND PUMP INSTALLATION CONTRACTORS.

Please refer to page 3, Section 5.2.5, which defines a "Cathodic Protection Hole". Then refer to page 1, where Title, Authority, and Scope of Rules brings these wells under the State Engineers jurisdiction. Then refer to page 27 for a summary table of what is required of operators of cathodic protection wells.

RECOMMENDATIONS

1. A Letter to Operators pointing out this state requirement be written.
2. The OGCC should not interfere in the State Engineer's jurisdiction. Problems arising from these wells should be immediately referred to the State Engineers office.
3. We should at least try and keep track of how many, and where, these wells are. This can be done by writing a very simple rule requiring a copy of the notice to the State Engineers office be filed with the OGCC. Those wells which don't require notice to the State Engineers office should be required to notify the OGCC with certain basic information.

4. The definition of cathodic protection well will have to be included in our Rules and Regulations.

5. These rule changes/additions should be enacted as soon as possible.

Please respond with your decisions and/or directions in regards to these recommendations.

cc: SP, ED, MW

Doc0309J

STATE OF COLORADO
OIL AND GAS CONSERVATION COMMISSION

DEPARTMENT OF NATURAL RESOURCES
SUITE 380 LOGAN TOWER BUILDING
1580 LOGAN STREET

DENVER, COLORADO 80203

(303) 894-2100

WILLIAM R. SMITH
Director

DENNIS R. BICKNELL
Deputy Director

JK

ROY ROMER
Governor

January 5, 1990

Memo

To: Reiner Haubold, Water Resources
From: John Stowell, OGCC

Enclosed is a copy of Order 474-1, which sets up "field rules" for wells drilled in a small section of Routt County. Notice that rule 7 specifically addresses cathodic protection wells. We will be using this basic format for future Orders related to coal bed methane development in other areas, such as the Piceance and Raton Basins. I suspect that we will add a general rule for cathodic wells when we update our official rules and regs in the future.

Please contact us at any time for discussions of issues of common interest.

JRS

Jim
Reiner is going to
make mention of 474-1
in his article in a well driller's
publication ...
JWS