

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
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DE	ET	OE	ES
Document Number: 400958786			
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SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

OGCC Operator Number: 2800 Contact Name CHERYL LIGHT
 Name of Operator: ANADARKO E&P ONSHORE LLC Phone: (720) 929-6461
 Address: PO BOX 173779 Fax: (720) 929-7461
 City: DENVER State: CO Zip: 80217-3779 Email: cheryl.light@anadarko.com

Complete the Attachment
Checklist

OP OGCC

API Number : 05- 123 00 OGCC Facility ID Number: 444333
 Well/Facility Name: Anadarko Delayed CBL Variance Well/Facility Number: _____
 Location QtrQtr: SESE Section: 36 Township: 8N Range: 61W Meridian: 6
 County: WELD Field Name: _____
 Federal, Indian or State Lease Number: _____

Survey Plat		
Directional Survey		
Srvc Eqpmt Diagram		
Technical Info Page		
Other		

CHANGE OF LOCATION OR AS BUILT GPS REPORT

- Change of Location * As-Built GPS Location Report As-Built GPS Location Report with Survey

* Well location change requires new plat. A substantive surface location change may require new Form 2A.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude _____ PDOP Reading _____ Date of Measurement _____
 Longitude _____ GPS Instrument Operator's Name _____

LOCATION CHANGE (all measurements in Feet)

Well will be: _____ (Vertical, Directional, Horizontal)

Change of **Surface** Footage **From** Exterior Section Lines:

Change of **Surface** Footage **To** Exterior Section Lines:

Current **Surface** Location **From** QtrQtr Sec

New **Surface** Location **To** QtrQtr Sec

Change of **Top of Productive Zone** Footage **From** Exterior Section Lines:

Change of **Top of Productive Zone** Footage **To** Exterior Section Lines:

Current **Top of Productive Zone** Location **From** Sec

New **Top of Productive Zone** Location **To** Sec

Change of **Bottomhole** Footage **From** Exterior Section Lines:

Change of **Bottomhole** Footage **To** Exterior Section Lines:

Current **Bottomhole** Location Sec Twp

New **Bottomhole** Location Sec Twp

Is location in High Density Area? _____

Distance, in feet, to nearest building _____, public road: _____, above ground utility: _____, railroad: _____, property line: _____, lease line: _____, well in same formation: _____

Ground Elevation _____ feet Surface owner consultation date _____

FNL/FSL		FEL/FWL	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Twp <input type="text"/>	Range <input type="text"/>	Meridian <input type="text"/>	
Twp <input type="text"/>	Range <input type="text"/>	Meridian <input type="text"/>	
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** attach deviated drilling plan

OTHER CHANGES

REMOVE FROM SURFACE BOND Signed surface use agreement is a required attachment

CHANGE OF WELL, FACILITY OR OIL & GAS LOCATION NAME OR NUMBER

From: Name ANADARKO DELAYED CBL Number _____ Effective Date: _____
VARIANCE

To: Name _____ Number _____

ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.

WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number _____ has not been drilled.

PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number _____ has not been constructed (Permitted and constructed pit requires closure per Rule 905)

CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number _____ has not been constructed (Constructed facility requires closure per Rule 908)

OIL & GAS LOCATION ID Number: _____

Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.

REQUEST FOR CONFIDENTIAL STATUS

DIGITAL WELL LOG UPLOAD

DOCUMENTS SUBMITTED Purpose of Submission: _____

RECLAMATION

INTERIM RECLAMATION

Interim Reclamation will commence approximately _____

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

Field inspection will be conducted to document Rule 1003.e. compliance

FINAL RECLAMATION

Final Reclamation will commence approximately _____

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

Field inspection will be conducted to document Rule 1004.c. compliance

Comments:

ENGINEERING AND ENVIRONMENTAL WORK

NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below or provide as an attachment, as required by Rule 319.b.(3).

Date well temporarily abandoned _____ Has Production Equipment been removed from site? _____

Mechanical Integrity Test (MIT) required if shut in longer than 2 years. Date of last MIT _____

SPUD DATE: _____

TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

NOTICE OF INTENT Approximate Start Date 12/22/2015

REPORT OF WORK DONE Date Work Completed _____

- Intent to Recomplete (Form 2 also required)
- Request to Vent or Flare
- E&P Waste Mangement Plan
- Change Drilling Plan
- Repair Well
- Beneficial Reuse of E&P Waste
- Gross Interval Change
- Rule 502 variance requested. Must provide detailed info regarding request.
- Other _____
- Status Update/Change of Remediation Plans for Spills and Releases

COMMENTS:

Requesting a field wide variance to Rule 308A as it applies to the running and filing of the Cement Bond Log (CBL). Please see the attached document for details pertaining to this variance request.

H2S REPORTING

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

Gas Analysis Report must be attached.

H2S Concentration: _____ in ppm (parts per million) Date of Measurement or Sample Collection _____

Description of Sample Point:

Absolute Open Flow Potential _____ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: _____

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: _____

COMMENTS:

Best Management Practices

No BMP/COA Type

Description

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Operator Comments:

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: CHERYL LIGHT

Title: SR. REGULATORY ANALYST Email: DJRegulatory@anadarko.com Date: 12/22/2015

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:  Date: 12/30/2015

CONDITIONS OF APPROVAL, IF ANY:

COA Type

Description

	On December 15th of every year, Anadarko will submit an Annual Report of the wells subject to this variance via a Sundry Notice for the Anadarko Delayed CBL Variance, Facility ID #444333. This report will identify all wells that were not logged with a Cement Bond Log within 60 days of rig release of the last well on a pad. The report will provide the following information for each of those wells: well name and number, API Number, current status, planned or actual Cement Bond Log date, planned or actual completion date, planned or actual Rule 326.d Mechanical Integrity Test (if applicable). Once a well has been reported both as logged and as completed on an Annual Report, it does not need to be included on subsequent Annual Reports.
	Anadarko will respond within 15 days to a written request by Commission staff to address any concerns regarding wells subject to this variance.

General Comments

User Group

Comment

Comment Date

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Total: 0 comment(s)

Attachment Check List

Att Doc Num

Name

400958786	FORM 4 SUBMITTED
400958802	VARIANCE REQUEST

Total Attach: 2 Files

December 22, 2015



Matt Lepore
Director, COGCC
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

Re: Request for 502.b Variance

Director Lepore,

Anadarko Petroleum Corporation submits this Request for 502.b Variance from COGCC Rule 308A on behalf of itself and its affiliates and subsidiaries (collectively "Anadarko"). This Variance Request is submitted pursuant to COGCC Rule 502.b and in accordance with the specific provisions in the "COGCC Form 2 Attachment Guidance, Variance Request". The compliance alternatives that are proposed for these rules are defined below.

Proposed Scope of the Variance

This request is for a field-wide variance from the otherwise applicable COGCC Rule 308A. Subject to specific limitations summarized below, the variance would apply to all of Anadarko's oil and gas operations in the Denver-Julesburg Basin of Colorado, including existing and future wells. As a field-wide variance, this Variance Request is not connected with a specific well, Oil and Gas Location, Form 2 or Form 2A.

Applicable Rules and Specific Requirements

COGCC Rule 308A: COGCC Form 5. Drilling Completion Report, specifically as the rule applies to running and filing of the Cement Bond Log (CBL).

Rationale for Variance: Delayed Completions

Over the past 10 years, oil and gas drilling has shifted from vertical wells to larger, multi-well drill pads for horizontal wells. Multi-well drill pads foster responsible development and utilization of natural resources, and protect public and private interests by reducing our overall footprint on the surface. Generally, these drill pads minimize the total surface necessary to drill and produce oil and gas. One consequence of the shift from single well pads to multi-well pads is the expanded infrastructure that is required to produce the wells and transport the oil and gas to market. A

more comprehensive network of water lines, flowlines and gathering lines must be in place before the wells are produced. As a result, subsequent operations, including the completion of wells and production operations is sometimes delayed.

Similarly, cement bond logs (CBL) need to accompany the Final Drilling Report (Form 5) within 60 days of rig release after drilling the last horizontal well on a pad. Anadarko's practice and an operational requirement for running a CBL is that a primary valve be placed on the horizontal well, prior to logging for well control. The time period between rig release and completion commencement can be longer than 2 months. Primary valve integrity can be compromised due to extended time period of inactivity, which can result in safety concerns that could potentially pose an environmental risk. There is also a significant cost to rent the primary valve, creating unnecessary economic burden during a time when commodity prices threaten economic viability.

The proposed variance will allow for balance between protecting public health, safety and the environment and producing oil and gas "up to its maximum efficient rate of production" during times when completions are delayed. For these reasons, Anadarko is requesting a variance from certain aspects of the cement bond log requirements (Rule 308A) that cannot be achieved economically. Also, compliance concerns with the CBL requirements is not limited to specific wells or specific Oil and Gas Locations. Anadarko faces these challenges at multiple locations throughout Colorado, and is therefore requesting the field wide rule variance.

This variance does not violate the Oil and Gas Conservation Act. The Colorado legislature, through the Oil and Gas Conservation Act (CRS §34-60-101 et seq.), declared that (1) fostering responsible, balanced development and utilization of oil and gas in a manner that is consistent with protecting public health, safety and the environment, and (2) protecting public and private interests against waste in the production of oil and gas, are in the public interest. Moreover, the COGCC is charged with taking cost-effectiveness and technical feasibility into consideration when mitigating adverse environmental impacts from oil and gas operations.

Without approval of this Variance Request, Anadarko will likely be forced to incur primary valve repair costs and rental charges until completion operations are commenced. This results in significant waste of valuable resources. Moreover, there is no adverse environmental impact, nor is there any environmental benefit from prematurely installing a primary valve. This delayed approach safeguards valuable resources, and minimizes waste by allowing cement bond logging to commence after drilling operations are complete and prior to completion operations commencing.

Compliance Alternatives for Granting Relief for ALL Wells not logged within 60 days of rig release of the last well on a pad:

1. Perform Bradenhead Test after cementing production casing string.
 - a. Submit Form 17 Bradenhead Test Report prior to, or concurrently with, Preliminary Form 5.

- b. Enter eForm document number of Form 17 as a related form on the Preliminary Form 5.
2. Submit Preliminary Form 5 within 60 days of rig release of the last well on a pad.
 - a. Required Comments on Preliminary Form 5
 - i. Estimated Waiting-on-Completion scheduled for Quarter/Year
 - ii. A statement that the actual Top of Productive Zone (TPZ) footages are not available and that estimated TPZ footages are provided. Include the measured depth used for the estimated footages, identify that particular point in the wellbore, and describe the basis for using that point as the estimated TPZ.
 - iii. No CBL or Cased Hole Neutron Log (if required) run or attached per Rule 502.b Variance for Rule 308A log submittal requirements.
 - b. Required Attachments on Preliminary Form 5
 - i. Cement Job Summary for every casing string in the well.
 - ii. All Open Hole logs run in the well
 - iii. The field-wide variance request letter as Correspondence.
3. Submit Form 5A within 30 days of completion date per Rule 308B.
4. Submit Form 7, Monthly Report or operations, with correct well status:
 - a. From spud until rig release report Drilling (DG) status
 - b. From rig release until completion operations commence report Waiting-On-Completion (WO) status
5. Comply with Rule 1003 Interim Reclamation requirements or request a site-specific variance.
6. Run Cement Bond Log (CBL) and Cased Hole Neutron Log (if required) within 2 years of rig release.

IF Well is logged and completed within 2 years of rig release:

1. Run Cement Bond Log (CBL) and Cased Hole Neutron Log (if required) at the time the well is completed.
2. Submit Final Form 5 with CBL and Cased Hole Neutron Log (if required) attached within 30 days of completion date.
 - a. Required Comment on Final Form 5
 - i. CBL and Cased Hole Neutron Log (if required) attached per Rule 502.b Variance for Rule 308A log submittal requirements.
 - b. Required Attachments on Final Form 5
 - i. CBL and Cased Hole Neutron Log (if required)

IF Well will NOT be completed within 2 years of rig release:

1. Run CBL and Cased Hole Neutron Log (if required) within 2 years rig release.
2. Submit Final Form 5 with CBL and Cased Hole Neutron Log (if required) attached within 30 days of logging date.

- a. Required Comment on Final Form 5
 - i. CBL and Cased Hole Neutron Log (if required) attached per Rule 502.b Variance for Rule 308A log submittal requirements.
 - ii. A statement that the actual Top of Productive Zone (TPZ) footages are not available and that estimated TPZ footages are provided. Include the measured depth used for the estimated footages, identify that particular point in the wellbore, and describe the basis for using that point as the estimated TPZ.
 - iii. Estimated Waiting-on-Completion scheduled for Quarter/Year
- b. Required Attachments on Final Form 5
 - i. CBL and Cased Hole Neutron Log (if required)
 - ii. The field-wide variance request letter as Correspondence.
3. Run Mechanical Integrity Test (MIT) within 2 years of setting production casing per Rule 326.d for Waiting-on-Completion well.
 - a. Submit Form 21 within 30 days of MIT date.
4. The Waiting-on-Completion well is considered to be an Inactive Well under Rule 707; provide adequate bonding using the criteria of Rule 707.
5. Submit Form 5A within 30 days of completion date per Rule 308B.
 - a. Required Comment on Form 5A
 - i. Provide the actual TPZ footages.
 - ii. A statement that the completion of the well was delayed.

Request for Approval of Variance

For the reasons outlined above Anadarko respectfully requests approval.

Thank you,



Ashley Coccione
Regulatory Manager

Approved by Director Matt Lepore

Date