

STATE OF
COLORADO

2193353

Mah - DNR, Steven <steven.mah@state.co.us>

Form 6 #401044653 for Federal 42-33 (107-06038)**Andrews - DNR, Dave** <david.andrews@state.co.us>

Fri, May 27, 2016 at 2:38 PM

To: David Wyman <brokenbox6431@yahoo.com>

Cc: Andrew Stone - DNR <andrewg.stone@state.co.us>, Steven Mah - DNR <steven.mah@state.co.us>, Stuart Ellsworth - DNR <Stuart.Ellsworth@state.co.us>, Sean Simpson <smsimpson@blm.gov>, Emily Waldron - DNR <emily.waldron@state.co.us>

David,

I just approved your Notice of Intent to Abandon for the subject well. You should receive a copy from the system shortly. You also need BLM's approval for this plugging prior to performing the work.

COGCC needs revised GPS data for this well per Condition of Approval (COA) #8.**COA #10 for this Federal 42-33 Form 6 further extends your Warning Letter corrective action deadline to 6/16/2016 (the deadline extension for Pagoda Unit 33-34P is still 6/15/2016, as indicated on the Form 6 for that well).**

COAs and Comments for the Federal 42-33 Form 6 are copied below for your reference:

Conditions of Approval

- 1) Provide 48 hour notice of plugging MIRU via electronic Form 42.
- 2) Changed cement on top of CIBP planned at 4280' from 2 sx to 3 sx for consistency with BLM Condition of Approval requirements for this well.
- 3) Pressure test 4+1/2" casing to 300 psi or as otherwise directed by BLM after setting cement on top of CIBP to check casing integrity. BLM Conditions of Approval for this well specify that, "All holes must be located and remedied with a plug." Operator shall notify COGCC of any plugging changes after consulting with BLM.
- 4) Added 15 sx cement plug in casing from 2640' to 2450' for consistency with BLM Condition of Approval requirements for this well. BLM Conditions of Approval for this well specify that, "This plug may not be necessary if other plugs are set in the vicinity to remedy leaks." Operator shall notify COGCC of any plugging changes after consulting with BLM.
- 5) Perforations moved down for surface casing shoe plug from 488' (at shoe) to 538' (50' below shoe). Operator's proposed 30 sx would leave 100' in annulus and 100' in casing with proper displacement. Increase cement volume from 30 sx to 35 sx (minimum) for consistency with BLM Condition of Approval requirements for this well. Top of cement in casing must be 438' or above in casing or as otherwise directed by BLM. Changes shown in this Condition of Approval have been made to the plugging procedure on this form.
- 6) Acceptable Alternative Plugging Procedure for Condition of Approval #5 (only to be used with BLM concurrence): combine surface casing shoe and surface plugs by perforating at 538' and pumping cement down casing and back to surface (COGCC Staff estimate of 237 sx, assuming 1.15 cf/sk yield and 25% excess with wellbore configuration shown on this form), top off as necessary to bring cement to surface.
- 7) Changed 15 sx cement half-in/half-out of surface casing (casing will not be pulled) to 20 sx at surface (plug required by rule 50' to surface in casing and annulus, and BLM Conditions of Approval require a minimum of 20 sx for surface plug).
- 8) Collect new as-drilled GPS data for this well and submit the new data on forthcoming Form 6 Subsequent Report of Abandonment, to be submitted after plugging this well. Previously-submitted GPS data for this well appears to be erroneous, as stated in COGCC's comments on this form.
- 9) Properly abandon flowlines per Rule 1103. File electronic Form 42 when flowline abandonment is complete.
- 10) COGCC received this form on 5/10/2016, 20 days prior to the extended Warning Letter deadline of

5/30/2016 (Warning Letter #2193224, Extension Correspondence #2193301). Approval of this form on 5/27/2016 resulted from an internal delay by COGCC engineering staff. With approval of this form, the Warning Letter #2193224 corrective action deadline for this well is being further extended to 6/16/2016, to provide the operator 20 days to complete plugging of this well that otherwise would have been allowed, had COGCC Staff approved this form on the same day of submittal.

Comments

Removed as-drilled GPS data from this form (reported by operator as Latitude 40.274450 / Longitude -107.401150, 9/30/2010, 3.0 PDOP by David Wyman). The same as-drilled GPS data was reported by the operator on Form 4 Sundry Notice #2121050, approved by COGCC on 2/1/2011. However, the GPS data appears to be erroneous, as it plots the well in the SWNW Section 33, T4N, R89W. The wellpad is clearly evident on aerial photographs in SENE Section 33, T4N, R89W at the footages from section lines shown on documents in COGCC's well file (1890 FNL, 500 FEL). Operator is required to complete a new GPS measurement and provide the new measurement data, as indicated in Condition of Approval #8 on this form.

Removed casing cut estimated depth of 4520', which is the total measured depth of the well. Operator does not plan to pull casing. Operator reported First String cement top of 2353' on this form (COGCC estimated approximately 2450'). The First String cement top in this well likely covers the Frontier Formation top at 2640', but a cement bond log is not available to verify cement coverage. Added existing bridge plug at 4375' as CIBP #2 (reportedly set above a lower set of Shinarump perforations on 6/20/1975 and discussed in operator's comment on this form).

BLM has primary jurisdiction for the plugging, but please contact me with any questions or issues during plugging.

Thanks,

Dave

David D. Andrews, P.E., P.G.
Engineering Supervisor - Western Region



P 970.625.2497 x1 | F 970.625.5682 | C 970.456.5262
796 Megan Avenue, Suite 201, Rifle, CO 81650
david.andrews@state.co.us | www.colorado.gov/cogcc