

STATE OF
COLORADO

2193354

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

Form 6 #401044267 for Pagoda Unit 33-34P (107-05021)**Andrews - DNR, Dave** <david.andrews@state.co.us>

Thu, May 26, 2016 at 2:19 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. I received an email from Sean Simpson with BLM on 5/23/2016 stating, "The Pagoda 33-34 is in a Federal PA, but it appears that it is FEE/FEE, so I'll just be accepting that NOIA for the record." I am working on the COGCC Form 6 for Federal 42-33 next.

Note that Condition of Approval #8 for the Pagoda Unit 33-34P Form 6 further extends your Warning Letter corrective action deadline to 6/15/2016. COAs and Comments for this Form 6 are copied below for your reference:

Conditions of Approval

- 1) Provide 48 hour notice of plugging MIRU via electronic Form 42.
- 2) First String is 7" casing. Increased volume of cement on top of planned CIBP at 3925' from 2 sx to 4 sx.
- 3) Pressure test 7" casing to 300 psi after setting cement on top of CIBP to check casing integrity. Notify COGCC engineering staff if casing does not hold pressure. Additional plug(s) may be required.
- 4) Additional Plug Required: Perforate at 2380' (Frontier top, reported by original operator as Ferron Sandstone), set CICR at 2280', squeeze 40 sx cement below CICR and set 4 sx on top of CICR. This plug is intended to isolate the Frontier (no annular coverage, as reported by operator) from the overlying Niobrara Formation.
- 5) Perforations moved down for surface casing shoe plug from 449' (at shoe) to 499' (50' below shoe). Operator's proposed 43 sx would leave 100' in annulus and 100' in casing with proper displacement. Increase cement volume from 43 sx to 55 sx (minimum) for excess cement. If a CICR is not used, then tag cement prior to setting plug at surface. Top of cement in casing must be 399' or above in casing. 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: combine surface casing shoe and surface plugs by perforating at 499' and pumping cement down casing and back to surface (COGCC Staff estimate of 272 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) Properly abandon flowlines per Rule 1103. File electronic Form 42 when flowline abandonment is complete.
- 8) 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 5/26/2016 resulted from an internal delay by COGCC engineering staff. With approval of this form, the Warning Letter #2193224 corrective action deadline is being further extended to 6/15/2016, 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 casing cut estimated depth of 4150', which is the total measured depth of the well. Operator does not plan to pull casing. Operator reported First String cement top of 2798' on this form. Original Log of Oil or Gas Well, dated 10/19/1949 #157698 indicates, "squeeze 200 sacks cement through 4-1/2" shot holes at 2960'." Changed first string cement top to 2960' and added Stage Cement 1.1 for First string from 2960' to 2798' with 200 sacks cement. Changed 22 sx cement half-in/half-out of surface casing (casing will not be pulled) to 22 sx

at surface (plug required by rule 50' to surface in casing and annulus).

Please contact me with any questions or issues during plugging.

Thanks,

Dave

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



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