



**Christopher L. Sandoz**  
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August 23, 2016

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203  
**Attention: Mr. Matt Lepore, Director**

**Re: 502.b Variance Request**  
**Rule 326.a.(1).A – Mechanical Integrity Testing Packer Placement Requirements**  
**Los Pinos Water Disposal No. 1 (API 05-067-06973)**  
**Sec 31 - Township 35N - Range 7W**  
**Ignacio Blanco Field**  
**La Plata County, Colorado**

Dear Mr. Lepore:

Pursuant to Rule 502.b, BP America Production Company respectfully requests a variance to Rule 326.a.(1).A which requires that a packer be placed within 100' of the top perforations when conducting a mechanical integrity test.

During recent workover efforts, BP believes that a hole was created in the tailpipe of the existing permanent packer while removing scale in an attempt to set an isolation plug. This tailpipe is part of the permanent packer assembly and limits our ability to pull tubing and redress seals without killing the well. In addition, the current packer is located approximately 26' above a second permanent packer in this well.

Consequently, BP requested and obtained verbal COGCC approval to leave the existing packer in place and set a new permanent packer approximately 25' above the existing packer in an effort to preserve future workover flexibility and avoid the risks of damaging the casing or creating a restriction by attempting to mill out the current packer.

The placement of the new packer in this well results in a distance of approximately 171' between the top perforation and the packer in conflict with the requirements of Rule 326.a.(1).A. As a result, BP respectfully requests a variance to the requirements of Rule 326.a.(1).A for the reasons stated above.

Should you have questions or require additional information, please contact me at (832) 619-6423 or christopher.sandoz@bp.com.

Sincerely,

Christopher L. Sandoz  
Regulatory Engineer – L48 West