



Tabula Rasa
ENERGY



Colorado Oil & Gas Conservation Commission
COGCC Enforcement: Steven Mah NOAV Specialist
1120 Lincoln Street, Suite 801
Denver, CO 80203

Thursday, March 23, 2017

Re: Warning Letter #401237551 Tabula Rasa Energy LLC (10467)

Dear Mr. Mah

It would appear we overlooked some paperwork concerning an MIT test conducted last August on the Harry Willis #3 (055-06144) well. I have enclosed the form 21 along with the pressure recording chart and the field inspection report for the referenced MIT test. In addition, concerning the Form 5A review, I enclosed a Form 5A from 2004 and a mechanical drawing from the same year. The wellbore has not been modified since this time. It is more or less a cased dry hole being preserved for future deepening. This brings up the last matter the Form 7 review. The well was never completed nor produced so there would be no Form 7.

I hope this clears up any and all issues. Please call me if there are any further questions.

Bob Sutherland
Senior VP, Operations
Tabula Rasa Energy LLC
281-668-8478

FORM
21
Rev 9/14State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)-894-2100 Fax: (303)-894-2109

FOR OGCC USE ONLY

Document Number:

MECHANICAL INTEGRITY TEST

1. Duration of the pressure test must be a minimum of 15 minutes.
2. An original pressure chart must accompany this report if this test was not witnessed by a OGCC representative. Injection wells tests must be witnessed by an OGCC representative.
3. For production wells, test pressures must be a at minimum of 300 psig.
4. New injection wells must be tested to maximum requested injection pressure.
5. For injection wells, test pressures must be at least 300 psig or average injection pressure, whichever is greater.
6. A minimum 300 psi differential pressure must be maintained between the tubing and tubing/casing annulus pressure.
7. Do not use this form if submitting under provisions of Rule 326.a.(1) B. or C.
8. OGCC notification must be provided 10 days prior to the test via Form 42.
9. Packers or bridge plugs, etc., must be set within 100 feet of the perforated interval to be considered a valid test.

RECEIVED
Date Received:
MAR 28 2017
COGCC

Complete the
Attachment Checklist

OGCC Operator Number: <u>10467</u>		Contact Name and Telephone Bob Sutherland		Oper	OGCC
Name of Operator: <u>Tabula Rasa Energy LLC</u>		No: <u>(281) 668-8478</u>		Pressure Chart	<input checked="" type="checkbox"/>
Address: <u>12012 Wickchester Land, #660</u>		Email: <u>bobs@tabularasa.com</u>		Cement Bond Log	<input type="checkbox"/>
City: <u>Houston</u>	State: <u>TX</u>	Zip: <u>77079</u>		Tracer Survey	<input type="checkbox"/>
API Number: <u>05-055-06144-00</u>		OGCC Facility ID Number: _____		Temperature Survey	<input type="checkbox"/>
Well/Facility Name: <u>Harry Willis 3</u>		Well/Facility Number: _____			<input type="checkbox"/>
Location QtrQtr: <u>SENW</u>		Section: <u>4</u>	Township: <u>29S</u>	Inspection Number	<input type="checkbox"/>
		Range: <u>69W</u>	Meridian: _____		



SHUT-IN PRODUCTION WELL



INJECTION WELL

Last MIT Date: 08/10/2011

Test Type:



Test to Maintain SI/TA status



5- year UIC



Reset Packer



Verification of Repairs



Annual UIC Test

Describe Repairs or Other Well Activities: _____

Casing Test

Use when perforations or open hole is isolated by bridge plug or cement plug; use if cased-hole only with plug back total depth.

Bridge Plug or Cement Plug Depth
Cement Plug 3,560 ft

Wellbore Data at Time of Test

Injection/Producing Zone(s) Pierre	Perforated Interval: -	Open Hole Interval: -
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Tubing Casing/Annulus Test

Tubing Size: -	Tubing Depth: -	Top Packer Depth: -	Multiple Packers? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Test Data

Test Date 08/10/2016	Well Status During Test SI	Casing Pressure Before Test 0	Initial Tubing Pressure -	Final Tubing Pressure -
Casing Pressure Start Test 475	Casing Pressure - 5 Min. 475	Casing Pressure - 10 Min. 475	Casing Pressure Final Test 475	Pressure Loss or Gain During Test 0

Test Witnessed by State Representative?

Yes ☐ No

OGCC Field Representative (Print Name):

J. Duran

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

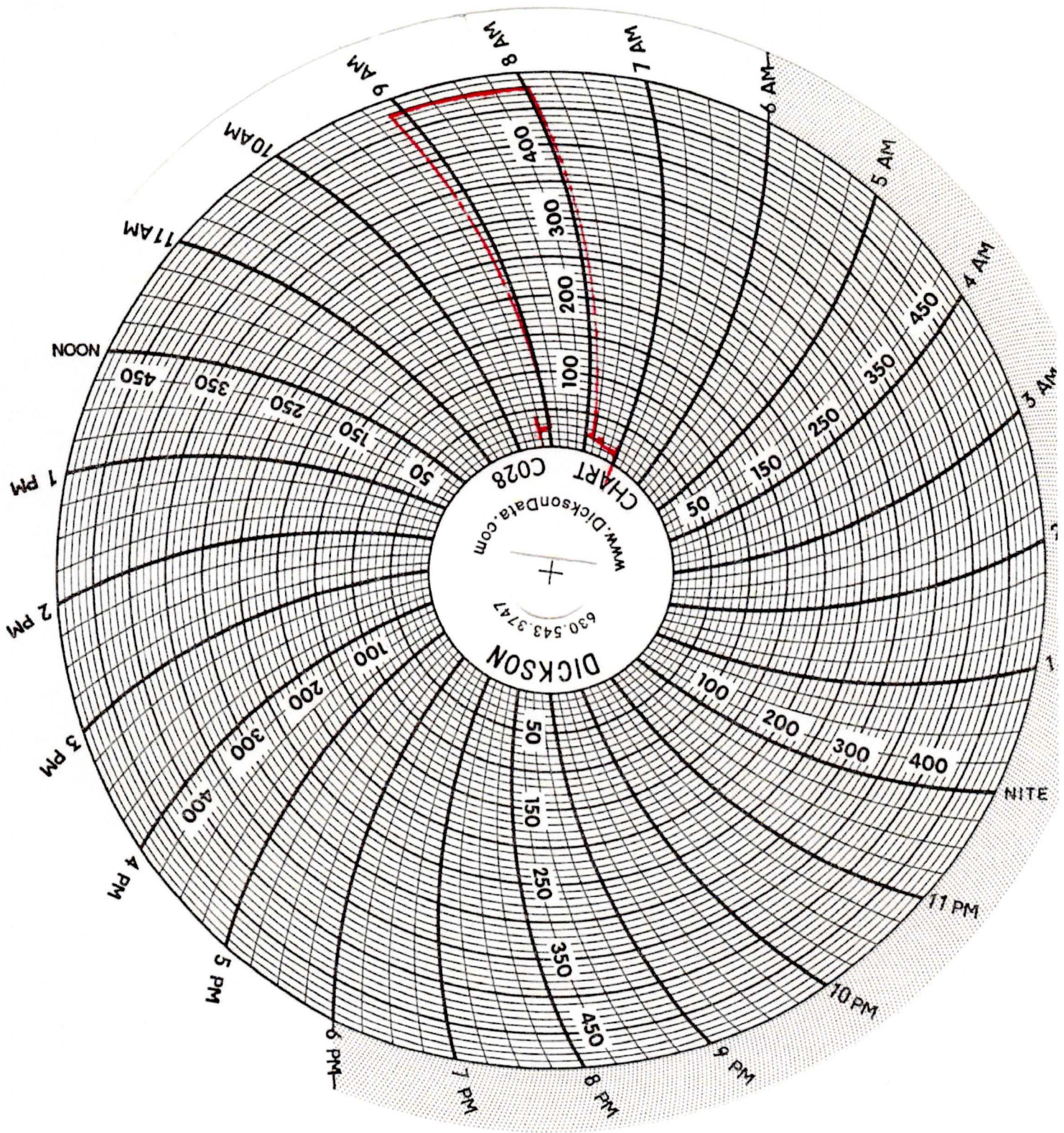
Print Name: Bob SutherlandSigned: Title: Senior VP, OperationsDate: 03/03/2017

OGCC Approval: _____

Title: _____

Date: _____

Conditions of Approval, if any:





COLORADO OIL & GAS CONSERVATION COMMISSION

FIELD INSPECTION REPORT

<input type="checkbox"/> NOTICE OF UNSATISFACTORY INSPECTION		1120 Lincoln St., Ste. 801, Denver 80203	
<input type="checkbox"/> NOTICE OF SATISFACTORY INSPECTION		303-894-2100	
Date: 8/10/16	Facility ID:	Operator: TABULA RASA	
Location: SENW-4-295-69W		Lease Name: HARRY WILLIS #3	
API Number: 05 - 055 - 06144		Inspector: J. DURAN	
INSP TYPE	INSP STATUS	REC STATUS	PASS/FAIL P F
	5/TA	I F P	
UIC VIOL TYPE UA MI OP PA OT		TBG/PKR LK	CSG LK
		<input type="checkbox"/>	<input type="checkbox"/>
ALL UIC VIOLATIONS REQUIRE NOA's			
Well ID Signs (Rule 210) Y N		Fences Y N (Rule 603.b.(7), 1002.a)	
Production Pits (Rule 902, 903, 904) EARTHEN PITS ONLY		Produced Water Pits Total # _____ Oil Accumulation? <input type="checkbox"/> YES <input type="checkbox"/> NO Comments: _____	
SENSITIVE AREA <input type="checkbox"/> YES <input type="checkbox"/> NO		Skimming/Settling Pits Total # _____ Covered # _____ Uncovered # _____ Comments: _____	
		Special Purpose Pits Total # _____ Lined # _____ Unlined # _____ Comments: _____	
Tank Battery Equipment (Rule 604)		WELLHEAD <input type="checkbox"/>	
		BURIED OR PARTIALLY BURIED VESSELS : #STEEL #FIBERGLASS #CONCRETE #OTHER	
Fire Walls/Berms/Dikes [Rule 604.a.(4)]		ON SITE AT 6:50 AM, M & A TRUCKS ON SITE (JEREMIAH), BRANDON (CO. MAN) TABULA RASA <input type="checkbox"/>	
General Housekeeping (Rule 603.g)		STARTED AT 8:00 AM. FINISHED AT 9:05 AM OFF SITE AT 9:10 AM <input type="checkbox"/>	
Spills and Releases (Oil/Water) (Rule 906)		NONE <input type="checkbox"/>	
UIC Routine Inspection FILL OUT FORM 21 WHEN WITNESSING MIT		Inj. Pressure _____ Psig T-C Ann. Pressure _____ Psig Brhd. Pressure _____ Psig COMMENTS PRESSURED UP WELL TO 475 PSIG. PRESSURE HELD FOR 1 HR. 5 MIN. WITH NO PRESSURE LOSS.	
Drilling Well/Workover (Rule 317)		CHART RECORDER AND PRESSURE GAUGE USED. <input type="checkbox"/>	
Surface Rehabilitation (Rule 1003, 1004)		<input type="checkbox"/>	
Miscellaneous		NEXT MIT ON (8/10/21) <input type="checkbox"/>	
CORRECTIVE ACTION REQUIRED:			
Date Corrective Action Required By:		Date Remedied:	

This report is a Notice of Inspection. The Commission requires that you correct any deficiencies shown on this report in a timely manner. Failure to comply may result in enforcement action by the Commission.

State of Colorado
Oil and Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax: (303)894-2109

RECEIVED
MAR 28 2017
COGCC

COMPLETED INTERVAL REPORT

This form is to be submitted or updated each time a new formation is completed or abandoned. This form shall be transmitted within 30 days of work. Additional information is found under Rule 308. Fill out a section for each formation completed or recompleted including all attempted completions. Attach as many pages as required to fully describe the work.

Complete the
Attachment Checklist

Oper OGCC

1. OGCC Operator Number: 74945	4. Contact Name and Telephone MIKE HANAGAN	Wellbore diagram	
2. Name of Operator: ROCKY MOUNTAIN GAS SUPPLY	No: 505-623-1996	Site facility diagram	
3. Address: P.O. BOX 2107	Fax: 505-625-0388		
City: ROSWELL State: NM Zip: 88202-210			

5. API Number: 05-055-6144	6. County: HUERFANO
7. Well Name: HARRY WILLIS	Well Number: #3
8. Location (QtrQtr, Sec, Twp, Rng, Meridian): SE/4NW/4, SEC. 4, T29S, R29W	

List in order of completion:

FORMATION:		<input type="checkbox"/> Producing	<input checked="" type="checkbox"/> Abandoned	<input type="checkbox"/> Shut-In	<input type="checkbox"/> Commingled
Perforations Gross Interval: Top NONE	Bottom: NONE	No. Holes:	Size:	Open Hole Completion (check if yes) <input type="checkbox"/>	
Formation Treatment Describe: WELL WAS DRILLED TO TOTAL DEPTH OF 5471' MD IN MAY, 2001 @ WHICH TIME DRILLING COULD NOT CONTINUE DUE TO HOLE CONDITIONS. A 75sk CEMENT PLUG WAS SET INSIDE THE 5.5" CASING @ 4380'-3560' (TAGGED) & THE HOLE FILLED W/DRILLING MUD					
Test Information	Date:	Hours:	Bbls Oil:	MCF Gas:	Bbls H ₂ O:
Production Test Method:		Casing Pressure:	Flowing Tubing Pressure:		Choke Size:
API Gravity Oil:	<input type="checkbox"/> Oil <input type="checkbox"/> Condensate	BTU Gas:	<input type="checkbox"/> Wet <input type="checkbox"/> CO ₂ <input type="checkbox"/> Helium <input type="checkbox"/> Dry <input type="checkbox"/> Coal Gas <input type="checkbox"/> Other:	Gas Disposition:	
Calculated 24 Hr. Rate	Bbls Oil:	MCF Gas:	Bbls H ₂ O:	GOR:	
Production Method:					
Tubing Size:	Setting Depth:		Packer Depth:		
Reason for Non-Production: WELL WAS NEVER COMPLETED DUE TO HOLE PROBLEMS					
Abandonment of Zone	Date: 5/19/2001	Squeezed: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Sacks Cement: 75sk PLUG 4380'-3560'		
Bridge Plug Depth:	Sacks Cement on Top:				

FORMATION:		<input type="checkbox"/> Producing	<input type="checkbox"/> Abandoned	<input type="checkbox"/> Shut-In	<input type="checkbox"/> Commingled
Perforations Gross Interval: Top	Bottom:	No. Holes:	Size:	Open Hole Completion (check if yes) <input type="checkbox"/>	
Formation Treatment Describe:					
Test Information	Date:	Hours:	Bbls Oil:	MCF Gas:	Bbls H ₂ O:
Production Test Method:		Casing Pressure:	Flowing Tubing Pressure:		Choke Size:
API Gravity Oil:	<input type="checkbox"/> Oil <input type="checkbox"/> Condensate	BTU Gas:	<input type="checkbox"/> Wet <input type="checkbox"/> CO ₂ <input type="checkbox"/> Helium <input type="checkbox"/> Dry <input type="checkbox"/> Coal Gas <input type="checkbox"/> Other:	Gas Disposition:	
Calculated 24 Hr. Rate	Bbls Oil:	MCF Gas:	Bbls H ₂ O:	GOR:	
Production Method:					
Tubing Size:	Setting Depth:		Packer Depth:		
Reason for Non-Production:					
Abandonment of Zone	Date:	Squeezed: <input type="checkbox"/> Y <input type="checkbox"/> N	Sacks Cement:		
Bridge Plug Depth:	Sacks Cement on Top:				

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

Print Name: **MIKE HANAGAN**

Signed:

Title: **AGENT**Date: **5/20/04**

Rocky Mountain Gas Supply, LLC
WELLBORE Diagram

Harry Willis #3

Oakdale Mountain
2226' FNL & 2585' FWL (Surface)
Sec. 4, T-29S, R-69W (Surface)
1941' FNL & 2043' FWL (Bttm Hole)
Sec. 4, T-29S, R-69W (Bttm Hole)
Huerfano County, CO
GL Elevation: 7976'
KB Elevation: 7988' (12')

8-5/8" Cemented w/128sx Class "C"
Circulated => Pit

Well Head

Fig 92, 8-5/8" x 5-1/2" SOW Casing Head w/2-2" LPO's (1K WP - 2K Test), 2" X-Hvy Bull Plug, 2" x 6" Nipple w/2" 2500PSI Ball Valve

5 1/2" J-55 SOW x 5-1/2" CSG Thrd Collar

5-1/2" CSG Thrd x 2" LP Casing Swedge

2" 2500PSI Ball Valve

Tubulars

	Size	No Jts	Grade - Wt	Thrds	Depth Set (RKB)
Cond.	13-3/8"	1	J-55 - #76/ft		40'
Surf.	8-5/8"	15	J-55 - #24/ft	ST&C	637'
	5-1/2"	98	J-55 - #15.50	LT&C	4346'
Tubing	N/A	N/A			N/A

5-1/2" TD @ 4346' (KB-MD)
Cemented w/710sx Class "C"

75sx Premium Plus KOP Plug

Top of "Fish" @ 4420' (KB-MD)

BHA Left in Ground
? x 5-1/2" DC's
Monel DC
Monel DC
M-Mtr
7-7/8" Bit

7-7/8" Open Hole TD @ 5086' (KB-MD)

50sx Temporary Abandonment Plug Set @ 3560'-4380'

KOP @ 4360' (KB-MD)/4265' (KB-TVD)

After "sticking the 7-7/8" Drill string BHA, Fishing Attempts were made, During the attempt, The rig Elevator latch "Broke" dropping the fishing string, The fish not Retrieved and Plans to SideKick around the 7-7/8" BHA were Implemented: A Balanced cement plug was set and a 4-3/4" Directional drilling assy. was used to kick-off and drill - Due to hole conditions ("heavy sluffing & heaving of shales") Hole was Temporarily abandond with a cemet plug across the 5-1/2" casing string shoe (3560'-4380')

4-3/4" Open Hole TD @ 5471' (KB-MD)/5380' (KB-TVD)

2/12/04