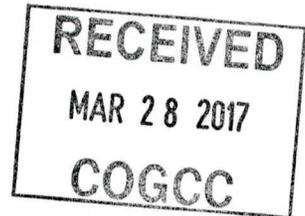




Tabula Rasa
ENERGY



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

Click here to reset the form

FORM 21 Rev 9/14

State 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.
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.



Complete the Attachment Checklist

OGCC Operator Number: 10467
Name of Operator: Tabula Rasa Energy LLC
Address: 12012 Wickchester Land, #660
City: Houston State: TX Zip: 77079
API Number: 05-055-06144-00
Well/Facility Name: Harry Willis 3
Location QtrQtr: SENW Section: 4 Township: 29S Range: 69W Meridian:

Table with columns: Oper, OGCC. Rows: Pressure Chart, Cement Bond Log, Tracer Survey, Temperature Survey, Inspection Number.

SHUT-IN PRODUCTION WELL [checked] INJECTION WELL []
Test Type:
[checked] Test to Maintain SI/TA status [] 5- year UIC [] Reset Packer
[] Verification of Repairs [] Annual UIC Test
Describe Repairs or Other Well Activities:

Wellbore Data at Time of Test
Injection/Producing Zone(s): Pierre
Perforated Interval: -
Open Hole Interval: -
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

Tubing Casing/Annulus Test
Tubing Size: -
Tubing Depth: -
Top Packer Depth: -
Multiple Packers? [] Yes [x] No

Test Data table with columns: Test Date, Well Status During Test, Casing Pressure Before Test, Initial Tubing Pressure, Final Tubing Pressure, Casing Pressure Start Test, Casing Pressure - 5 Min., Casing Pressure - 10 Min., Casing Pressure Final Test, Pressure Loss or Gain During Test.

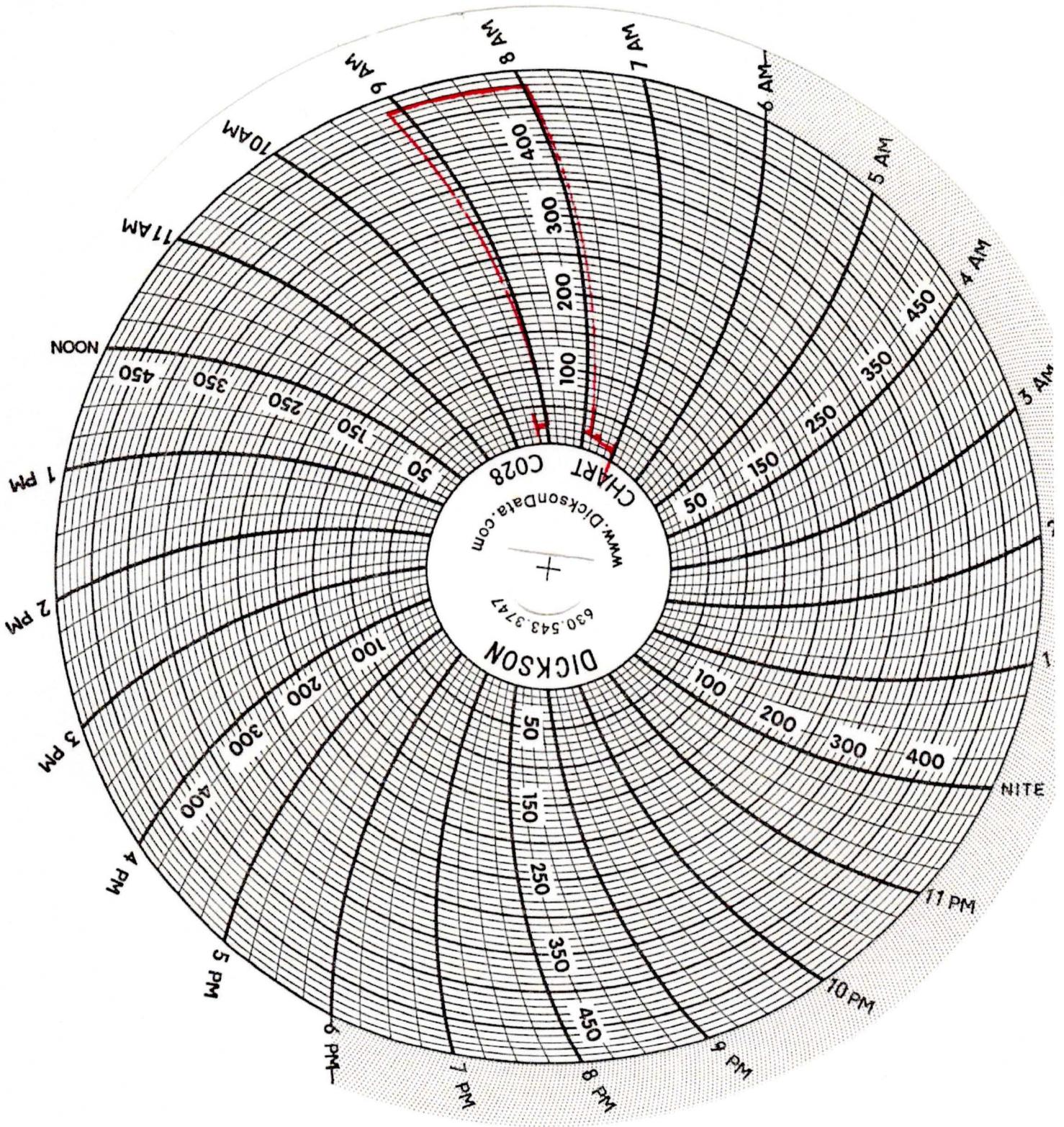
Test Witnessed by State Representative? [x] Yes [] No
OGCC Field Representative (Print Name): J. Duran

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

Print Name: Bob Sutherland
Signed: [Signature] Title: Senior VP, Operations Date: 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 <input checked="" type="checkbox"/> NOTICE OF SATISFACTORY INSPECTION	1120 Lincoln St., Ste. 801, Denver 80203 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 SITA	REC STATUS I F P	PASS/FAIL P F	VIOLATION Y N	NOV Y N
-----------	----------------------------	----------------------------	----------------------	----------------------	----------------

UIC VIOL TYPE UA MI OP PA OT	TBG/PKR LK <input type="checkbox"/>	CSG LK <input type="checkbox"/>	ALL UIC VIOLATIONS REQUIRE NOA's
---	-------------------------------------	---------------------------------	---

Well ID Signs Comments:	Fences Y N	Comments:
(Rule 210) Y N	(Rule 603.b.(7), 1002.a)	

Production Pits (Rule 902, 903, 904) EARTHEN PITS ONLY	Produced Water Pits Total # NONE 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)	OK 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"/>
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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



FOR OGCC USE ONLY
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

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

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

FORMATION:	<input type="checkbox"/> Producing	<input checked="" type="checkbox"/> Abandoned	<input type="checkbox"/> Shut-In	<input type="checkbox"/> Commingled
Perforations Gross Interval: Top <u>NONE</u>	Bottom: <u>NONE</u>	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: <u>5/19/2001</u>	Squeezed: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Sacks Cement: <u>75sk PLUG 4380'-3560'</u>	
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)

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

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

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)

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)