



# Kerr-McGee Oil & Gas Onshore LP

A subsidiary of Anadarko Petroleum Corporation

1099 18<sup>th</sup> Street  
Denver, CO 80202  
720-929-6000

September 25, 2017

Mr. Matthew Lepore, Esq.  
Director, Colorado Oil and Gas Conservation Commission  
Department of Natural Resources  
The Chancery Building  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: **Request for Form 2 Expedited Approval Due to Unexpected Circumstances**  
Meguire 1 (Document #401395378)  
Meguire 2 (Document #401395379)  
Meguire 4N-16HZ Pad (Location ID #331104 / Document #401395377)  
Section 21: NW  
Township 2 North, Range 65 West, 6th P.M.  
Weld County, Colorado

Dear Director Lepore:

Pursuant to Colorado Oil and Gas Conservation Commission (COGCC) Rule 303.i, Kerr-McGee Oil and Gas Onshore LP (KMG) hereby requests expedited approval of the Form 2 for the Meguire #1 (Document #401395378) and the Meguire #2 (Document #401395379) wells due to exigent circumstances. The above-captioned wells are being drilled to access the previously drilled Adamson 35C-28HZ (API #05-123-41824 / Document #400833307) and Adamson 28N-28HZ (API #05-123-41821 / Document #400833290) wells to allow for the subsurface plugging and abandonment of the Adamson wells. The Meguire wells will not produce hydrocarbons; they will be subsequently plugged and abandoned at the conclusion of operations.

The following information and discussion is intended to meet COGCC requirements and support KMG's request for expedited approval of Form 2.

#### **Identification of Pending Application for KMG's Meguire #1 and Meguire #2 wells**

- Legal Location: SW/4 NW/4, Section 21, Township 2 North, Range 65 West, Weld County (CO)
- Form 2: Meguire #1, Document # 401395379
- Form 2: Meguire #2, Document #401395379
- Form 2A: Meguire 4N-16HZ Pad, Document #401395377, Location ID #331104

#### **Description of Situation Requiring Expedited Approval**

- Adamson 35C-28HZ – coiled tubing became stuck in the well during operations to prepare the well for production and is unable to be retrieved from the surface. Previous attempts to workover this work from surface have not been successful. KMG is preparing to access the well from the subsurface (via the Meguire #1 well) to properly plug and abandon the Adamson wellbore.

- Adamson 28N-28HZ – *small-diameter measurement equipment became lodged in the well during operations and is unable to be retrieved from the surface. KMG is preparing to access the well from the subsurface (via the Meguire #2 well) to properly plug and abandon the Adamson wellbore.*
- Based on our operations schedule, the wells are anticipated to spud during the week of September 25<sup>th</sup>. This will allow KMG to drill the access wells, plug and abandon both Adamson wells, and subsequently plug and abandoned the Meguire wells.

The approval of the above-captioned Form 2s (Documents #401395378 and #401395379) in an expedited manner, without notice or consultation, will allow KMG to drill the wells necessary to access the Adamson wells for plugging and abandonment. Further, commencing these operations in a timely manner, under known wellbore conditions, will allow for operations to be conducted in a prudent and safe manner.

**Sworn Statement of Accuracy**

On behalf of Kerr-McGee Oil & Gas Onshore LP, I, Nathan S. Bennett, hereby certify that the above statements are true and correct to the best of my knowledge.



**Requested COGCC Action**

COGCC Rule 303.i provides that *“The Director may issue a permit at any time in the event that an operator files a sworn statement and demonstrates therein to the Director’s satisfaction that”* expedited approval is prudent and will avoid and/or alleviate hardship. KMG believes this request complies with Rule 303.i(2) as it states, *“Due to exigent circumstances (including a recent change in geological interpretation), significant economic hardship to a drilling contractor will result or significant economic hardship to an operator in the form of drilling standby charges will result.”*

Please find attached signed copies of the Rule 305.c waivers from the surface owner and the LGD. Based on the information provided herein, KMG believes it has demonstrated exigent circumstances exist in this instance and that its request meets the requirements necessary for expedited approval without notice or consultation. Therefore, KMG respectfully requests that the COGCC issue the above-referenced Form 2 without consultation per Rule 303.i(2).

Thank you for your prompt attention and consideration to this matter.

Respectfully,

**KERR-MCGEE OIL AND GAS ONSHORE LP**



Nathan S. Bennett  
Regulatory Manager

Attachments: Rule 305.c Waiver – LGD, Weld County  
Rule 305.c Waiver – Surface Owner, Mr. William A. Meguire, Jr.