



# Kerr-McGee Oil & Gas Onshore LP

A subsidiary of Anadarko Petroleum Corporation

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

May 9, 2018

Department of Natural Resources  
Oil and Gas Conservation Commission  
The Chancery Building  
1120 Lincoln St., Suite 801  
Denver, CO 80203

Attention: Kira Gillette

Re: Warning Letter #401605691

Dear Ms. Gillette:

In response to COGCC Warning Letter #401605691, dated April 12, 2018 (“Warning Letter”), Kerr-McGee Oil & Gas Onshore LP (“Kerr-McGee”) has evaluated the alleged violation pursuant to Rules 316B. and 316C.f. pertaining to the failure to submit the Form 42 Notice of Mechanical Integrity Test (“Form 42 MIT”) at least 10 days prior to the performance of such test for the HSR-CERVI STATE 7-19 (API #05-123-19538) well location.

In review of our records, Kerr-McGee did indeed fail to notify the COGCC of an intent to perform a Mechanical Integrity Test via Form 42 prior to conducting the test on March 20, 2017, thereby violating a portion of Rule 316B and Rule 316C.f. Kerr-McGee is in compliance with the portion of Rule 316B. pertaining to the filing of the results of the mechanical integrity test with the required pressure chart via Form 21 within 30 days after the test completions. The Form 21 was filed on March 28, 2017 and included the pressure chart.

The process to ensure that future regulatory compliance is met for the abovementioned rules includes the following procedure:

1. A biweekly operators meeting is held between the production engineers, operators and foreman for an area review to identify wells requiring an MIT, which are then assigned to a rig. The regulatory analyst meets weekly with each foreman of the assigned rigs to determine if any upcoming MITs have been scheduled within the next two weeks and will submit the Form 42 notifications for MITs at least 10 days prior to the planned MIT dates, but not more than one month in advance.



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2. The wellsite supervisor tracks the Form 42 documented MIT dates and communicates via email any changes to the date (between one and five days) to the area Inspector; if the date shifts past five days then Kerr-McGee will submit a revised Form 42 to the COGCC with the newly anticipated date of the MIT.
3. The wellsite supervisor will verbally contact the area COGCC Inspector should there be a need to move the planned MIT date inside the 10 day Form 42 window. If the COGCC Inspector grants approval, a documentation of the conversation by the wellsite supervisor will be emailed to the COGCC Inspector and COGCC Area Inspector. Kerr-McGee will then document this approval on the Form 21 when filed.

As of today, all mechanical integrity test filings are in compliance for Rules 316B. and 316C.f.

If you need further information or clarification please contact me at (720) 929-6100 or [kristina.geno@anadarko.com](mailto:kristina.geno@anadarko.com).

Very truly yours,

**Kerr-McGee Oil & Gas Onshore LP**

A handwritten signature in blue ink that reads "Kristina Geno".

Kristina Geno  
Regulatory Affairs Analyst

cc:  
Mark Schlagenhauf  
Edith Difima  
Toni Newville