

The City & County of Denver requests consideration that this well demonstrates mechanical integrity for the following reasons and that these tests are considered acceptable and the Director approves this demonstration of mechanical integrity as allowed by Rule 326.

The City believes this well actively demonstrates Mechanical Integrity. We do not think the tubing and casing pressures reported on the December were accurate. A Bradenhead test was run on December 9, 2019 (Doc # 402273367) showing no bradenhead pressure and tubing/casing pressure of 270/270 psi. The tubing/casing/bradenhead pressures recorded for March, April and May were 250/475/0, 260/475/0 and 280/410/0 respectfully.

Once a well does not have integrity, the old drilling mud seeps into the wellbore and kills the well. Since the well has kept pressure, it has proven mechanical integrity. The City would monitor the pressures each month until the well starts production to ensure integrity.