

From: [Joan Proulx](#)
To: [Joan Proulx](#)
Subject: FW: Idle Well Slated for P&A - Braden Head Test for MIT
Date: Monday, January 25, 2021 7:32:08 AM

From: Dan Fouts <dfouts@laramie-energy.com>
Sent: Tuesday, January 19, 2021 1:00 PM
To: Joan Proulx <jproulx@laramie-energy.com>
Subject: FW: Idle Well Slated for P&A - Braden Head Test for MIT

Here you go.

From: Katz - DNR, Aaron <aaron.katz@state.co.us>
Sent: Thursday, January 14, 2021 4:49 PM
To: Dan Fouts <dfouts@laramie-energy.com>
Cc: Burger - DNR, Craig <craig.burger@state.co.us>
Subject: Re: Idle Well Slated for P&A - Braden Head Test for MIT

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Dan,

Thank you for including the information in your email. An alternative MIT can be conducted on this well by completing a Form 17 bradenhead test by the CA date 03/09/2021 followed by completing plugging operations as you indicated. Please submit a Form 4 sundry requesting for an alternative MIT and include the information from your initial email. Have a good evening and let me know if you have any follow up questions.

Regards,

Aaron Katz

Northwest Area Engineer



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On Thu, Jan 14, 2021 at 12:32 PM Dan Fouts <dfouts@laramie-energy.com> wrote:

Aaron, Craig,

I am looking at Laramie subject well Gunderson 13-13 (05-077-09011) slated for P&A. It was tested for SWD purposes in late 2018 and into 2019 and is currently idle with no tubing in the well. We have submitted internal (AFE) and external (Form 6) P&A documents and plan to P&A it in Q2 or Q3 of 2021. A recent inspection (attached) triggered an MIT due by 3/9/2021. We are currently planning to set a CIBP, fill the well, and pressure test to satisfy the MIT requirement. Although setting a CIBP will be a part of the P&A, it adds a cost to bring in the wireline unit a second time and bring in a service company for the MIT pressure test. In this case, will a braden head test satisfy the MIT requirement? Note that the casing was pressured tested to prior to SWD testing, and SWD testing included a short term surface pressure of 925 psi during the step rate test and then 720 psi during the 30 day step rate test that ran into January 2019. There are no strong reasons to suspect that wellbore integrity has rapidly degraded in just over 2 years.

We do not intend to push for replacing standard MITs with braden head test MITs, but I propose that this scenario warrants exercising that option. An alternative view is that if a standard MIT is performed and fails, the outcome will be that Laramie will have 6 months to either restore integrity or P&A the well. In this case, all scenarios (no MIT, MIT fail, and MIT pass) result in the same outcome of P&Aing the well, but the standard MIT incurs more costs. We are in the process of getting ahead of our MIT, P&A, and other regulatory wellbore integrity requirements, so I do not envision this becoming a frequent occurrence.

Do you gentlemen approve of a bradenhead test to satisfy the MIT in this case? Please let me know if you would like further information or to have a discussion.

Thank you,
Dan Fouts
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