



PETROLEUM, INC.



00283896

P.O. BOX 60
CASPER, WYOMING 82602-0060

307/235-8801

November 21, 1985

RECEIVED

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COLO. OIL & GAS CONS. COMM

William R. Smith, Director
Colorado Oil and Gas Conservation Commission
1580 Logan Street, Suite 380
Denver, Colorado 80203

RE: Water Disposal
Buczowskyj #3-X
Sec. 22-T12N-R56W
Weld County, Colorado

Dear Sir:

Petroleum, Inc. respectfully asks that you personally review the rejected application for water disposal dated August 23, 1985.

Petroleum, Inc. is aware that the surface casing does not cover the fresh water producing Fox Hills Formation and believes that, in order to protect this zone from pollution, surface casing or cement is not required. The tubing-casing annulus will be pressure tested as required in order to prove that no communication exists between the inside and outside of the tubing and casing. In order to pollute or deplete the Fox Hills, there would have to be two simultaneous failures: 1) tubing or packer failure; 2) casing failure. If pressure tested regularly, these unlikely failures would be discovered before any damage may occur.

In order to further support the case, Petroleum, Inc. asks to revise Section 8 of the application for water disposal. It states, "The estimated maximum surface injection pressure will be 1500 psig." In order to reduce the risk of tubing or casing failure, and thereby possible pollution, the maximum surface injection pressure will be reduced to 250 psig. Also, the maximum amount of injection could be reduced from 750 BWPDP to 250 BWPDP.

Petroleum, Inc. would also ask the Director to consider the dimensions and economics of the problem. The lease has two wells producing 8 BOPD. This volume of oil cannot economically support the workover required to cement the Fox Hills at Buczowskyj #3-X.

Petroleum, Inc. asks the Director to reconsider the decision with the knowledge that the Fox Hills Formation is and will be protected from the disposal operations which have been proposed.

Respectfully,

Daniel Bulfer, P. E.
District Superintendent

DB/jlb

Attachments

cc: Ken Stevenson
R. G. Julius
Bob Heaton
Ed DiMatteo ✓