



→ Dennis!

See reverse side
for additional comments
by Dave.

DES

6/8/92

Date: June 5, 1992

To: Dave Smink

From: Dave Shelton

Re: Need for exact plugging orders on approved permits to drill

This well (NE NW 22 16S 46W) is a perfect example of why I believe the Commission should put detailed plugging orders on each permit to drill. Supposedly no one from the Commission could be reached at 0400 Saturday, November 16, 1991. Bill Smith was then called for instructions. I was notified on November 18, after the work was completed (see summary on VP).

After reviewing the logs, I am certainly not satisfied with the way the well was plugged.

Dakota top: 1311
Dakota base: 1538
Cheyenne top: 1616
Cheyenne base: 1709
Blaine top: 2248

It is imperative that we get a plug approximately 100 feet above the Blaine salt in order to protect the Dakota and Cheyenne aquifers. There is usually at least 400 feet between the base of the Cheyenne and the top of the Blaine. It will not be that difficult to specify this interval on the permit. In this well the deepest plug was set at the very base of the Dakota. I do not consider this acceptable.

Thank you for your consideration,

Dave:

I concur that the plugging of this well is not adequate, particularly since John Stowell's conditions of approval required "adequate plugs to protect the Dakota and Cheyenne aquifers". Bill Smith, who is not an employee of the OGCC, should have required that Muth contact one of the staff.

One of the difficulties we face in specifying plugs on Forms 2, at least for wildcard wells, is that we do not know a) precisely where the formation will occur and b.) do not know whether or not the formation will be porous.

(over)

One of the more important items on my "list of things to do" is to draft a plugging memorandum to the state, by basin. Perhaps we can get to this when the Senior Engineer's job is filled. At least I hope so.

I will pass this on to Dennis for his review and comments, then let's visit again.

I have sketched the plugs on the Induction log, and have labeled formation tops and Q.

Thank you,

DES

6/8/92.

DAVE

OF COURSE WE WILL NOT BE ABLE TO SPECIFY EXACT PLUGS FOR POTENTIAL PAY ZONES, BUT WE CAN BE PRECISE ENOUGH TO SPECIFY ADEQUATE PLUGS FOR AQUIFER PROTECTION. NOTICE THIS EXAMPLE. BY SPECIFYING A PLUG AT 1900' THE DAKOTA + CHEYENNE ARE ISOLATED FROM THE BLAINE SALT. THERE IS OVER 500' BETWEEN THE CHEYENNE BASE AND THE BLAINE TOP. WE HAVE ENOUGH DATA TO GET A PLUG IN THIS AREA FOR ANY WELL DRILLED IN THE SOUTHEAST REGION.

I DO NOT MEAN TO RELEASE OPERATORS FROM THE RESPONSIBILITY OF CALLING IN FOR VERBAL ORDERS. IT WILL BE NECESSARY FOR PROPER BOTTOM HOLE PLUGS. BUT WE CAN ELIMINATE THE PROBLEM OF IMPROPERLY PLACED PLUGS NECESSARY FOR AQUIFER PROTECTION.

SPL 6-8-92

I UNDERSTAND THE NEW RULES HAVE A 7 DAY WAITING PERIOD FOR APD APPROVAL. I WOULD BE WILLING TO REVIEW ALL PERMITS FOR MY AREA & ISSUE ORDERS SIMILAR TO THIS EXAMPLE.