

**From:** [Axelson, John](#)  
**To:** ["Robert Willis"; Burn, Diana](#)  
**Cc:** [Jake.Matter@state.co.us](#); [Lindblom, Steven](#); [Gowen, Peter](#); [Scan, OGCC](#)  
**Subject:** RE: Response from Beren Corp. to COGCC concerning NOAVs issued at Cook #1-X and Wright #1 wells.  
**Date:** Wednesday, February 29, 2012 8:27:46 AM

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Rob,

One clarification after reading the subject letter, I never ordered Beren to shut down operations at the Cook #1-X well. I also confirmed that Diana never ordered them to shut down operations. Unless somebody else at COGCC issued a field order, as referenced in the letter, there is no reason they can't produce the well while unresolved compliance issues are resolved.

The NOAV clearly provided 90-days to submit a Form 27 for the closure and/or upgrade of the skim pit. It is probable that they would need to shut in the well to properly cleanup the release and address other issues such as the submerged skim pit cover and leak at the well head, but COGCC never ordered it.

If you would like to meet to discuss these issues, I'm available next week on Thursday.  
Thank you,

John Axelson, P.G.  
Environmental Protection Specialist, Northeast Region  
Colorado Oil & Gas Conservation Commission  
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Cell: 303-877-9964  
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Cc. [NOAV #200337810 - Correspondence](#)

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**From:** Robert Willis [mailto:[rwillis@burlesonllp.com](mailto:rwillis@burlesonllp.com)]  
**Sent:** Tuesday, February 28, 2012 3:15 PM  
**To:** Burn, Diana; Axelson, John  
**Cc:** [Jake.Matter@state.co.us](mailto:Jake.Matter@state.co.us)  
**Subject:** Response from Beren Corp. to COGCC concerning NOAVs issued at Cook #1-X and Wright #1 wells.

Dear Diana and John,

Please refer to the attached letter.

You will note that Beren Corp. ("Beren") is requesting an expedited review of staff's position as to its field order shutting down operations at the Cook #1-X Well.

Please feel free to call/email me to address or clarify Beren's position.

Regards,

Rob

Robert A. Willis  
Senior Counsel

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