

**From:** [Craig Burger - DNR](#)  
**To:** ["Graeve, Mark"](#)  
**Cc:** [Jay Krabacher - DNR](#)  
**Subject:** RE: Low TOC Notification  
**Date:** Wednesday, March 04, 2015 8:17:00 AM

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Mark,  
WPX can proceed with the planned completions.  
The low TOC will need to be addressed with one of the following options:

Option 1: Remediate the production casing to provide cement coverage specified in the COA. A sundry notice for intent is not required if the Form 5 has not been submitted and the repairs will be included on the Form 5 submittal. We can comment on proposed procedures if desired.

Option 2: Provide a conclusive, written demonstration with attached exhibits on a Sundry Notice using drilling records, bradenhead pressures, logs, water well records and/or any offset oil & gas well records to demonstrate that fluids (oil, gas, and water) and coal seams are adequately isolated to prevent cross-zone migration. If the demonstration is acceptable, then we will waive the COA requirement.

Please call if you have questions.

Craig Burger  
Northwest Area Engineer



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**From:** Graeve, Mark [mailto:Mark.Graeve@wpxenergy.com]  
**Sent:** Monday, March 02, 2015 11:37 AM  
**To:** Craig Burger - DNR  
**Subject:** FW: Low TOC Notification

Sorry Craig – looks like I sent this to the wrong email.

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**From:** Graeve, Mark  
**Sent:** Monday, March 02, 2015 10:23 AM  
**To:** Graeve, Mark; 'Krabacher - DNR, Jay'  
**Cc:** Foreman, Jay; Neifert-Kraiser, Angela; Haddock, Reed; Salazar, Sandi; Hejl, Kent  
**Subject:** Low TOC Notification

Hello Jay,  
This email is to notify you that out of the 10 wells awaiting completion on the GM 11-28 pad, two wells have a low top of cement. Neither well has bradenhead pressure, and we would like to schedule them for completion. Please advise.

API #: 05-045-22188 MV Well

- New drill – GM 413-21
- Top of Cement- 5,451'
- This well *doesn't* cover the top of the Mesa Verde, Mesa Verde Top Geology pick: 4,635
- This well *does* cover the top of gas Geology pick: 5,930'
- *Bradenhead pressure is 0 psi*
- The planned top perf depth is approximately 500' below the top of cement

API #: 05-045-22187 MV Well

- New drill – GM 314-21
- Top of Cement- 4,387'
- This well *doesn't* cover the top of the Mesa Verde, Mesa Verde Top Geology pick: 4,270'
- This well *does* cover the top of gas Geology pick: 5,477'
- *Bradenhead pressure is 0 psi*
- The planned top perf depth is more than 500' below the top of cement

Thanks,

Mark Graeve

Completions Engineer II

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