

**From:** [Steven Arauza - DNR](#)  
**To:** ["sdonato@gwogco.com"; "twoodworth@gwogco.com"](#)  
**Cc:** [Diana Burn - DNR](#); [Bob Koehler - DNR](#)  
**Subject:** ACTION REQUIRED: Land JG wells waiting on completion (31-35D, 31-32D, 31-20D, 31-18D, 31-12D)  
**Date:** Friday, July 24, 2015 2:40:00 PM  
**Attachments:** [Form21\\_Mechanical\\_Integrity\\_Test\\_Instructions.pdf](#)

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Recently Form 21 Mechanical Integrity Tests have been filed for the wells listed below:

Well	API	MIT Doc #
Land JG 31-35D	123-36589	400845623
Land JG 31-32D	123-36610	400845870
Land JG 31-20D	123-36595	400845915
Land JG 31-18D	123-36591	400845945
Land JG 31-12D	123-36608	400845957

These wells had been spud, cased, and cemented around March of 2013, but have not been completed, according to COGCC records. The MITs were passed today, but there are a few issues with the wells (listed below) that require action on the part of the operator.

*MIT Timing.* Rule 326.d requires wells that are waiting on completion to have an MIT performed within two years of the date that casing was set in the well. Each of these wells had been cased by March 2013 and their MITs were performed at the end of May 2015, making each MIT late according to Rule 326.d. Again, the MITs were allowed to pass COGCC review, this is just a reminder of MIT requirements for WO wells for future reference.

*MIT instructions.* The MITs for each well listed above did not include any plug or tubing depths. [Instructions for MITs](#) (attached), listed on the Forms page of the COGCC website, indicate that the plugback depth should be reported in the Bridge Plug or Cement Plug Depth section of the form.

*Sundry Notice required.* These wells have been waiting on completion for over two years now. For COGCC purposes, the wells qualify as temporarily abandoned, pursuant to the definition of a Temporarily Abandoned Well in COGCC 100-series Rules, "a well which is incapable of production or injection without the addition of one or more pieces of wellhead or other equipment." **Great Western Operating is required to submit a Form 4 Sundry Notice for each of the wells listed (filed as a Notice of Continued Temporarily Abandoned Status) to provide a description of future plans for utilization of the wells. Sundry Notices must be filed for each of the five (5) wells listed above by August 24, 2015.**

Feel free to contact me directly if you have any questions regarding this email.

Thank you,  
**Steven J. Arauza, G.I.T.**  
Engineering Intern



**COLORADO**  
Oil & Gas Conservation  
Commission

Department of Natural Resources

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