



**COLORADO**

**Oil & Gas Conservation  
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

November 12, 2015 (sent via email)

Re: Delayed Completions and Rule 308A Compliance

Tracey Fallang

[fallang@billbarrettcorp.com](mailto:fallang@billbarrettcorp.com)

**BILL BARRETT CORPORATION**

1099 18th Street | Suite 2300

Denver, CO 80202

Dear Tracey,

Bill Barrett Corporation (BBC) has informed the COGCC that it is delaying well completions beyond 60 days from rig release for the last well drilled on a pad. As the result of this delay, the actual Top of Productive Zone (TPZ) will not be available for reporting on the Form 5 in the timeframe required by Rule 308A.

COGCC staff has determined that these delayed completions do not require a Rule 502.b Variance from the Rule 308A requirements so long as BBC meets the reporting conditions described below for all wells with completions delayed beyond 60 days from rig release for the last well drilled on a pad.

**1. Submit Final Form 5 within 60 days of rig release for the last well drilled on the pad per Rule 308A.**

**a. Required Data on Final Form 5**

- i. All data fields are completed.
- ii. Provide the most accurate estimated footages for the TPZ location possible.

**b. Required Comments on Final Form 5**

- i. A statement that the Well is Waiting-on-Completion, including the scheduled completion date.
- ii. A statement that the actual TPZ footages are not available and that estimated TPZ footages are provided. Include the measured depth used for the estimated footages, identify that particular point in the wellbore, and describe the basis for using that point as the estimated TPZ.
- iii. Information required per logging BMP on APD.

P 303.894.2100 F 303.894.2109 [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,  
James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk

John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



c. Required Attachments on Final Form 5

- i. All logs run in well.
- ii. Cement Job Summary for every casing string in the well not verified by a Cement Bond Log.
- iii. This letter as Correspondence.

**2. Submit Form 5A within 30 days of completion date per Rule 308B.**

a. Required Information in Comments on Form 5A

- i. Provide the actual TPZ footages.
- ii. A statement that the completion of the well was delayed.

b. Required Attachments on Form 5A

- i. This letter as Correspondence.

**3. Include this letter as a Correspondence attachment on Form 5s and Form 5As submitted for all wells with completions delayed beyond 60 days from rig release for the last well drilled on a pad.**

**COGCC staff has informed BBC of these other compliance matters related to delayed well completions:**

- Rule 326.d requires an operator to perform a mechanical integrity test and submit a Form 21 if a well has not been completed within two years of setting the production casing.
- Rule 1003 requires an operator to perform interim reclamation of areas no longer in use.

Thank you.

Sincerely,



Jane Stanczyk  
Permit and Technical Services Manager  
[jane.stanczyk@state.co.us](mailto:jane.stanczyk@state.co.us)  
303-894-210 X 5119

