



## **Bison Oil & Gas, LLC**

518 17th Street, Suite 1800  
Denver, CO 80202  
Phone: 720-644-6997  
Fax: 303-974-1767

November 28, 2017

Colorado Oil and Gas Conservation Commission  
Attn: Matt Lepore, Director  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

RE: COGCC Rule 303.I.(2): Expedited Approval Request Due to Exigent Circumstances  
De Ford #1 Intercept Well: NESE Section 19, Township 8 North, Range 59 West  
Weld County, Colorado

Dear Mr. Lepore,

To comply with the Condition of Approval listed on the Castor 8-59 19-24-12 Well API 05-123-45842, on November 17, 2017, Bison Oil & Gas II, LLC (Bison) moved a rig to the De Ford #1 API 05-123-05533, a well previously drilled and abandoned in 1955, to re-enter and properly isolate the Codell, Niobrara, and fresh water zones. Bison rigged up a 6-3/4" cone bit and tagged the first cement plug at 42'. Bison began drilling out the cement plug and made 3' of hole in 4 hours. After 5 additional hours of drilling, no new hole was made, and there were pieces of wood and metal shavings in the returns. Next, Bison picked up a 4-3/4" blade bit, resumed drilling, and made 2' of new hole in 5 hours. When the bit was pulled out of the hole after 5 hours, it was completely worn down. Bison then picked up a new 7-7/8" mill, tagged at 42', milled for 4 hours and made no new hole. A 7-1/2" junk mill was picked up and made 6" of new hole in 4 hours. Bison then picked up a new 6-3/4" bit, tagged at 42', drilled for 4 hours and made no new hole. The cut-rite on the bit was worn down when it was pulled out of the hole. Next, Bison ran a downhole camera to view the obstruction, and it appeared to be an upside-down drill bit left in the hole during the original P&A in 1955. Bison ran a magnet to attempt to recover with no success. Next, Bison ran a 7" washover shoe and attempted to washover for 1 1/2 hours with no success. The cut-rite was worn down on the bottom of the washover shoe. A hydrovac was used to remove fluid from the hole and the downhole camera was run again. The stuck drill bit appeared to be slightly worn down. At that point, Bison contacted the COGCC to discuss the next steps.

Bison has made every reasonable attempt to re-enter and properly plug the De Ford #1 using the existing wellbore. Bison is proposing to intercept the De Ford #1 below the surface casing and cement (approximately 250' TVD) from a new well drilled 10' west of the De Ford #1. Bison plans to use this re-entry as a method to properly isolate the Codell, Niobrara, and fresh water zones prior to hydraulically fracturing the horizontal well within 1500' of the De Ford #1. After intercepting the De Ford #1, Bison will washdown to the Codell and set cement plugs as originally proposed on the submitted and approved Form 6. Bison has been in constant communication with the COGCC throughout this process and has received permission to move forward with our proposed plan.



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Based on ongoing conversations with the COGCC, Bison has filed a Form 2A Oil and Gas Location Assessment Amendment (Doc Id: 401467784) and a Form 2 (Doc Id: 401466790) for the proposed De Ford #1 Intercept well in the NESE of Section 19, Township 8 North, Range 59 West.

Under Rule 303.I.(2), Special Circumstances for permit issuance without notice or consultation due to exigent circumstances, Bison respectfully requests expedited approval of the Form 2A Amendment and Form 2 listed above.

The surface owner has waived Rule 305.c notices and consultations on page five of the attached Surface Use Agreement and the LGD waived the comment period via the attached email correspondence.

This Expedited Approval Request letter is my sworn statement and demonstration that Rule 303.I.(2) exists in the case of the attempted P&A efforts concerning the De Ford #1 Well API 05-123-05533.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Kane". The script is cursive and fluid.

Elizabeth Kane  
Senior Production Engineer