



**TEP Rocky Mountain LLC**  
**4828 Loop Central Drive, Suite 900**  
**Houston, Texas 77081**

December 28, 2017

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

RE: TEP Rocky Mountain LLC (TEP) – Request for Expedited Approval of Form 2, Rule 303.i.(2)  
For the Tri State Trucking PA 643-26, Form 2 (Doc #401479415)  
Tri State Trucking PA 22-25 Pad (COGCC Loc #335123)  
Township 6 South, Range 95 West, 6<sup>th</sup> P.M.  
Section 25: SE1/4NW1/4  
Garfield County, Colorado

Dear Mr. Lepore:

This letter requests expedited approval and issuance of the Tri State Trucking PA 643-26 Form 2 (Doc #401479415) without consultation per Rule 303.i.(2) based on the addition of a replacement well following a failed attempt to drill a well, resulting in a plug and abandonment (P&A). Specifically, during operations on the Tri State PA 443-26 well (API # 05-045-23664-00), a stuck pipe event occurred in the surface hole. The bottom-hole assembly (BHA) became free of the restriction, but backed-off at a service break in the mud motor. This created a fish in the hole. After failed attempts to recover the fish, P&A operations commenced upon approval from the COGCC and the BLM. A Form 6 (Doc # 401481265) for this well was submitted on December 13, 2017.

Consequently, a replacement well (PA 643-26) was identified and selected for the A13 pad cellar slot. This slot was selected as it was best suited for anti-collision efforts relative to the new wells planned for this location. The position of this slot is most conducive for conductor hole operations when accounting for the rig position and wellhead spacing. The ideal time to set the conductor for this slot is on or about January 5, 2018, prior to the 20-day public comment period and subsequent approval. The challenges associated with drilling the conductor beyond this timeframe would result in increased costs and time required to modify skid rails, standpipe, flowline, and electrical lines, and require manipulation to avoid well heads that will be installed during completions operations. The H&P 271 is currently drilling on this location and simultaneous completion operations is planned to shorten the total drilling and completions time on this location. Expedited approval of the PA 643-26 Form 2 to accomplish setting the conductor is appreciated.

Originally, a designated setback location exception was granted for the Tri State Trucking PA 22-25 pad, and consequently twenty-five Form 2s and Form 2A were approved on August 25, 2017. The expedited review, as expressed above, is a result of the need to plug the Tri State Trucking PA 443-26 well. This sworn statement acknowledges that the situational description above is accurate and correct to the best of the signatory's knowledge and belief.

Attached please find signed waivers obtained by TEP from the surface owner and the local government designee (LGD) waiving the Rule 305.c twenty-day comment period for this Form 2 permit application.

Your timely attention and acceptance of this request is appreciated. If you have any questions, please contact me directly at 970-263-2736

Sincerely,

A handwritten signature in blue ink, appearing to read "JDK", with a long horizontal flourish extending to the right.

Jeffrey D. Kirtland  
Regulatory Lead

[jkirtland@terraep.com](mailto:jkirtland@terraep.com)

Attachments