



## COLORADO

### Oil & Gas Conservation Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

December 17, 2015 (sent via email)

Re: Delayed Completions and Rule 308A Compliance

Ashlee Fechino

[ashlee.fechino@wpxenergy.com](mailto:ashlee.fechino@wpxenergy.com)

WPX Energy Rocky Mountain, LLC

1058 CR 215

Parachute, CO 81635

Dear Ashlee,

WPX has informed the COGCC that it is delaying well completions on approximately 30 wells into 2016. This will result in completions commencing more than 60 days after 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 WPX 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. (No Preliminary Form 5 is required.)**

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

- i. All data fields are completed.
- ii. Provide estimated footages for the TPZ using the Bottom Hole Location (BHL) footages.
- iii. Directional Data uploaded in the Xcel template.
- iv. All formation tops including a top for Ohio Creek, Mesaverde, Williams Fork, and Cameo and any other permitted or completed formations.
- v. As drilled GPS coordinates with a comment if taken at conductor setting.

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



- b. Required Operator Comments on the Submit Tab of the Form 5
  - i. A statement that the Well is Waiting-on-Completion.
  - ii. The scheduled completion date.
  - iii. A statement that the TPZ footages are estimated and based on the BHL footages because the well has not been completed yet.
  - iv. Information required per logging BMP on APD, including identifying the well on the pad that has open-hole logs.
- c. Required Attachments on Final Form 5
  - i. All logs run in well, including CBL and cased-hole neutron.
  - ii. Cement Job Summary for every casing string in the well not verified by a Cement Bond Log.
  - iii. Directional Survey PDF of survey with side/plan view.
  - iv. Directional Data Xcel template.
  - v. This letter as Correspondence.

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

- a. Required Operator Comments on the Submit Tab of the Form 5A
  - i. 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. Submit Form 7 within 45 days of the month being reported with the correct well status.**

- b. From spud until rig release report Drilling (DG) status.
- c. From rig release until completion operations commence report Waiting-On-Completion (WO) status.

**4. 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 WPX 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  
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303-894-210 X 5119

