



OPPERMAN & ASSOCIATES, P.C.
ATTORNEYS AT LAW

1-61

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410 KITTREDGE BUILDING
511 SIXTEENTH STREET
DENVER, COLORADO 80202

TELEPHONE (303) 623-1970
TELECOPIER (303) 893-9328

May 10, 1995

VIA HAND DELIVERY

Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

Re: Colorado Interstate Gas Company
Application for Authorization to Conduct Underground Disposal
Young #31 Well, T4N, R58W, Section 14, Morgan County, Colorado

Dear Sir:

Opperman & Associates represents Wendell and Margaret Wacker, owners of surface and mineral interests in Sections 12 and 13 of the referenced township directly adjacent to Colorado Interstate Gas Company's (CIG) proposed Young #31 water injection well. On behalf of the Wackers, this letter constitutes a protest of CIG's application and serves as a request for a hearing before the Commission on CIG's application.

Contrary to CIG's statements contained in its letter of March 10, 1995 to the Commission, the injection of water into the Young #31 will damage or destroy the Wacker's ability to recover oil and gas from the "J" sand formation on their property. CIG's application fails to address the communication in the "J" sand existing between the Young #31 and the Wacker's property. The injection of water into the Young #31 will essentially flood out hydrocarbons existing under the Wacker property. The Wacker's are prepared to present evidence of the probable existence of hydrocarbons in the "J" sand under their property as well as evidence as to the damage or destruction to their ability to recover oil and gas from the "J" sand due to the Young #31 well at a hearing before the Commission through the testimony of Mr. Phillip H. Mintz, petroleum geologist.

The Wacker's property was included within the designated boundaries of the Young Field gas storage project and Young Gas Storage Company, Ltd. (CIG acts as agent for this entity) filed a Complaint to condemn the Wacker's surface and mineral interests. Only after the Wackers opposed CIG's acquisition and the condemnation action did CIG discover new evidence indicating the Wacker's property was not needed for the project. Young Gas Storage then abandoned the condemnation action in December 1994 and sought an order from the Federal Energy Regulatory Commission (FERC) amending the project to exclude the Wacker's property. However, evidence submitted by Young in its initial application to FERC indicates that the Wacker's property is essential to the project's operation. The proposed injection of "D" sand

water into the "J" sand in the Young #31 from gas storage operations will result in migration from that well onto Wacker's property, damaging their property while avoiding the payment of just compensation.

The Wackers do not have sufficient evidence at this time to adequately address ground water contamination issues which may result from the proposed Young #31 well. The Wacker's reserve the right to address these issues at a hearing before the Commission.

Respectfully submitted,

OPPERMAN & ASSOCIATES, P.C.


Douglas S. Widlund

cc: Mr. Stephen R. Jacobs
Senior Staff Engineer
Production and Storage Department
Colorado Interstate Gas Company
P.O. Box 1087
Colorado Springs, CO 80944

TRICIA, M-Place in hearing file.
HERE ARE WENDAL WACKER THRS,
LETTERS FROM THE ORIGINAL B
YOUNG 31 WELL FILE. THEY ARE
IN ORDER. I BELIEVE WE
HAVE ALREADY ADDRESSED
WENDAL'S CONCERNS.

DAVE DILLON



DEPARTMENT OF NATURAL RESOURCES

Roy Romer, Governor

1120 Lincoln St., Suite 801

Denver, CO 80203

Phone: (303) 894-2100

FAX: (303) 894-2109

May 30, 1995

1-61

Mr. Douglas Widlund
Opperman & Associates, P.C.
410 Kittredge Bldg.
Denver, Colorado 80202

RE: Young #31 Water Disposal Well

Dear Mr. Widlund,

Thank you for your letter concerning the Young #31 well. We understand Mr. Wacker's concerns about water injection. We have reviewed the permit for the Young #31 and we do not feel this well will impact his property.

The Young #31 well is located in the SW/4 of the NE/4 of Section 14 of T 4 N, R 48 W. This location is one-quarter mile away from Mr. Wacker's property. The estimated volume of water to be injected into the "J" Formation is small enough (5,917,000 bbls) to effect the "J" Sand at a distance of 1000' or less from the wellbore. Therefore, no water will be injected under Mr. Wacker's land. Logs of the well indicate all injected water will be contained in the "J" Sand.

For the above reasons, the Oil and Gas Conservation Commission does not feel that a hearing is required for this permit. Thank you again for writing. I am also enclosing a pamphlet which explains our underground injection control program. I hope it will answer any other questions that you may have.

Very truly yours,

David K. Dillon
Sr. Petroleum Engineer

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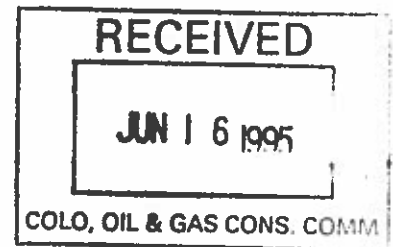
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TELEPHONE (303) 623-1970
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June 16, 1995

VIA HAND DELIVERY

Mr. David K. Dillon
Senior Petroleum Engineer
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203



Re: Colorado Interstate Gas Company
Application for Authorization to Conduct Underground Disposal
Young #31 Well, T4N, R58W, Section 14, Morgan County, Colorado

Dear Mr. Dillon:

Opperman & Associates represents Wendell and Margaret Wacker, owners of surface and mineral interests in Sections 12 and 13 of the referenced township directly adjacent to Colorado Interstate Gas Company's (CIG) proposed Young #31 water injection well. We received your letter of May 30, 1995 stating that the Commission does not feel that a hearing is required in regard to the Young #31 injection well. The Wackers still believe a hearing is warranted and request a reconsideration of the Commission's decision. The Wackers are aware of several other parties requesting a hearing and it appears as though there is a significant degree of public interest in the Young #31 which warrants a hearing before the Commission.

The Wackers request that all information submitted by CIG to the Commission in regard to the Young #31 well to date be made available for inspection and copying. The Wackers also request that all future information submitted by CIG to the Commission on the well be copied to the Wackers to my attention at the above address. Thank you.

Respectfully submitted,

OPPERMAN & ASSOCIATES, P.C.

A handwritten signature in black ink, appearing to read "Douglas Widlund".
Douglas S. Widlund

June 30, 1995

OPPERMAN & ASSOCIATES, P.C.

R E C E I V E D
JUL 10 1995
AM ☐ PM ☐

Mr. Douglas Widlund
Opperman & Associates, P.C.
410 Kittredge Bldg.
Denver, Colorado 80202

RE: Young #31 Water Disposal Well

Dear Mr. Widlund,

We have received your letter of June 16, 1995, and we have noted Mr. Wacker's concerns. As I wrote in my original letter, we do not feel this well will impact Mr. Wacker's property.

1) Mr. Wacker's acreage is over 1320 feet away from the injection well.

2) The most liberal engineering calculations indicate that the farthest distance the injection water will travel is 1000 feet. This distance is significantly short of the distance needed to impact Mr. Wacker.

3) The other protestants which you noted in your letter hold acreage at a distance of over a mile, and therefore have even a lesser chance of impact than Mr. Wacker.

Due to the above reasons the Oil and Gas Conservation Commission feels there is no reason to hold a hearing prior to issuing this permit.

Finally, the records of the Commission are open to the public for inspection and copying. I have already personally helped Mr. Wacker gather information and I would be happy to help him or you in the future. I cannot, however, send Mr. Wacker information as you requested in your letter.

Very truly yours,


David K. Dillon
Sr. Petroleum Engineer