

STATE OF COLORADO  
**OIL AND GAS CONSERVATION COMMISSION**

DEPARTMENT OF NATURAL RESOURCES  
SUITE 380 LOGAN TOWER BUILDING  
1580 LOGAN STREET

DENVER, COLORADO 80203

WILLIAM R. SMITH  
Director

(303) 866-3531

FRANK J. PIRO  
Deputy Director

RICHARD D. LAMM  
Governor



00283897

December 3, 1985

Mr. Daniel Bulfer, P.E.  
Petroleum, Inc.  
P.O. Box 60  
Casper, Wyoming 82602-0060

RE: Water Disposal - Buczkowskyj #3-X  
Sec. 22, T.12N., R.56W

Dear Mr. Bulfer:

Prior to your letter I had an opportunity to discuss your application for water disposal with Ed DiMatteo.

There are several factors that we must take into consideration in reviewing these applications: the proximity to a drinking water supply, the methods available to protect the supply and the administrative problems involved in approving waivers or variances to accepted completion practices.

One of the problems that is of great concern to us is older areas of development where insufficient surface casing was set to protect the uppermost fresh water supplies. Our rules specifically provide that these zones be protected either with surface casing or stage cementing. Since the White River and Ogallala formations north of Greeley and the South Platte River to the east have only recently been mapped, many wells were completed like the Buczkowskyj without sufficient surface casing. We took the position that since these were producing wells and pressures would deplete prior to any possible pollution that we would not require the operators to go back and squeeze. The potential for pollution from a salt water disposal well injecting under pressure is an entirely different thing.

Mr. Daniel Bulfer, P.E.  
December 3, 1985  
Page 2

I have encouraged Ed to discuss with you the possibility of injection with no surface pressure (on a vacuum), or the potential for a bradenhead squeeze of the open water zone which is a much more economical way to seal off upper zones. If a program were approved for injection with no surface pressure, the exposed aquifer would have to be squeezed if the well pressured up at some future date. In any event, with our current staffing, we are unable to administer exceptions of this type with the plan you propose.

Under the Administrative Procedures Act of Colorado, you have the right to appeal my decision to the Commission. I would only say that we are committed to certain requirements under the delegation of primacy by the U.S. EPA in Colorado and since the matter is a technical one we should be able to resolve it if it can be resolved at the staff level.

Very truly yours,

*William R. Smith*

William R. Smith, P.E.  
Director

WRS:bm





PETROLEUM, INC.

P.O. BOX 60  
CASPER, WYOMING 82602-0060  
307/235-8801

November 21, 1985

RECEIVED

NOV 25 1985

William R. Smith, Director  
Colorado Oil and Gas Conservation Commission  
1580 Logan Street, Suite 380  
Denver, Colorado 80203

COLO. OIL & GAS CONS. COMM.

RE: Water Disposal  
Buczowskyj #3-X  
Sec. 22-T12N-R56W  
Weld County, Colorado

Dear Sir:

Petroleum, Inc. respectfully asks that you personally review the rejected application for water disposal dated August 23, 1985.

Petroleum, Inc. is aware that the surface casing does not cover the fresh water producing Fox Hills Formation and believes that, in order to protect this zone from pollution, surface casing or cement is not required. The tubing-casing annulus will be pressure tested as required in order to prove that no communication exists between the inside and outside of the tubing and casing. In order to pollute or deplete the Fox Hills, there would have to be two simultaneous failures: 1) tubing or packer failure; 2) casing failure. If pressure tested regularly, these unlikely failures would be discovered before any damage may occur.

In order to further support the case, Petroleum, Inc. asks to revise Section 8 of the application for water disposal. It states, "The estimated maximum surface injection pressure will be 1500 psig." In order to reduce the risk of tubing or casing failure, and thereby possible pollution, the maximum surface injection pressure will be reduced to 250 psig. Also, the maximum amount of injection could be reduced from 750 BWPD to 250 BWPD.

Petroleum, Inc. would also ask the Director to consider the dimensions and economics of the problem. The lease has two wells producing 8 BOPD. This volume of oil cannot economically support the workover required to cement the Fox Hills at Buczowskyj #3-X.

Petroleum, Inc. asks the Director to reconsider the decision with the knowledge that the Fox Hills Formation is and will be protected from the disposal operations which have been proposed.

Respectfully,

Daniel Bulfer, P. E.  
District Superintendent

DB/jlb

Attachments

cc: Ken Stevenson  
R. G. Julius  
Bob Heaton  
Ed DiMatteo