

## alternate MITs, alternate bradenhead tests



Liz Harkins

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Diane and Eric,

As small Operators in Fremont County, Rick Mills of Cinnamon Creek Oil & Gas Inc, Jim Javernick of Javernick Oil LLC, and myself, Liz Harkins of AusCo Petroleum, discuss and try to stay abreast of issues relating to our wells. One issue with Cinnamon Creek and Javernick Oil is in regards to annual bradenhead test requirements. These two companies operate many pierre shale oil wells that were cable-tool drilled between 1863 and early 1900's. Very little completion information is available on these wells, but as evidenced with plugging operations, they are open-hole completions with uncemented surface casing set between 165' - 250' hung and welded onto wellhead without openings for bradenhead valves and produced thru an uncemented production string, also hung and sometimes welded onto the wellhead. Recent inspections have identified these wells for NOT having annual bradenhead tests. The operators are concerned with hot-tapping a valve to install bradenhead valves since the casing is nearly 100 years of age. None of these wells have measurable pressure. One inspector suggested that perhaps an MIT would satisfy the requirement, but even that seems to be highly risky, in respect to pulling all downhole equipment and the uncemented production casing that is probably mudded and stuck. Also of risk is setting a packer in the surface string for the pressure test.

Is there any other alternative that the ECMC would consider to satisfy the annual bradenhead test? These historical wells have continued to produce 1/2 - 2 BOPD on a flat line decline for the past 20 years. The Operators would like to file a variance for bradenhead/MIT testing on each well but request your input.

I look forward to hearing back from you.

Thank you,

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