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► **COGCC**

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Attn: Robert P. Koehler. PhD

Re: Federal F-29-3-101-S (API # 05-103-08531)

I am writing on behalf of Southwestern Energy Ventures Company (Operator #10328) to request an extension for conduction a mechanical integrity test on the Federal F-29-3-101-S (API # 05-103-08531). Since purchasing the wells out of bankruptcy, SWEVCO has begun the arduous process of prioritizing action on these wells without proper records and well histories. SWEVCO was able to conduct an MIT on the Federal 25-4 (API # 05-103-09061 in December of 2013 during treacherous winter weather that greatly extended the duration of the well preparation time. In addition, these record temperatures did present a safety hazard. SWEVCO made the decision to proceed with the test in spite of these difficulties, as it was deemed that action on the Cathedral field would demonstrate to the COGCC the intent of the company to be a responsible operator, and a good steward of these resources.

While preparing the Federal O-22-3-101-S (API # 05-103-08588) for an MIT test, it was discovered that a packer was installed high in the well to isolate the perforations from what is assumed to be a shallow hole in the casing. Due to the temperatures, it was decided that attempting a cement squeeze, which would require fresh water, would be very difficult and prone to failure. Thus the MIT was cancelled and the packer was reinstalled as found so that the well could be squeezed or plugged when temperatures permitted.

I have submitted form 42 for two of the three wells mentioned in the NOAV issued in order to bring them into compliance before the February 5th deadline. A fluid level gun has indicated that there is a shallow packer in the Federal F-29, and SWEVCO suspects that it was installed to isolate this hole from the perforations. SWEVCO would like to ask for either an extension for conducting this MIT, or permission to substitute another well at this time. If granted, SWEVCO will submit a Sundry to perform a squeeze job to repair the well in May of 2014 followed by an MIT test to confirm squeeze integrity. If SWEVCO is not

granted an extension or substitution, we will comply with squeezing the well and conducting an MIT before the date mentioned in the NOAV. Please be aware that attempting to squeeze in sub-zero temperatures on a daylight rig may render the process less effective and increase the likelihood that the squeeze may fail. Increased costs associated with the shorter days and difficult winter conditions may possibly force abandonment of this well sooner in the operational cycle than if SWEVCO was allowed to conduct these operations at a later date.

Thank You for your consideration,

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Principal

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