



"Paul Black"
<pblack@bnp-corp.com>
>

To: Darrell_Echols@nps.gov, "Paul Black" <PBlack@bnpcorporation.com>
cc: Mark_Biel@nps.gov, Colin_Campbell@nps.gov
Subject: Re: A3 workover

11/08/2006 02:28 AM
GMT
Please respond to
pblack

Darrell,

Please call me at your convenience. It appears that the rrc rep has confused you regarding this matter.

Paul

-----Original Message-----

From: Darrell_Echols@nps.gov
Date: Tue, 7 Nov 2006 18:03:31
To: "Paul Black" <PBlack@bnpcorporation.com>
Cc: Mark_Biel@nps.gov, Colin_Campbell@nps.gov
Subject: A3 workover

Paul,

I just finished speaking to the Railroad Commission (RRC) regarding the work that was conducted on the A3 well location. There appears to be some confusion regarding what is being proposed, what has been accomplished, and what is covered by the existing compliance for the A3 well. It is our understanding that the work proposed by BNP for A3 was to prepare the well for re-drilling and then move the Parker rig to re-drill the A3 well through the existing well bore based on the letter that we received on November 2. This work is covered in the existing Plan of Operations that BNP adopted from Vector and is similar to what was proposed and accomplished for the A8 well previously.

However, it appears that the A3 well has been plugged and abandoned. This assessment is based on conversations with the RRC, examination of the logs completed by the workover rig, and examination of the A3 site location. If the A3 well has been plugged, this is not what was originally proposed. We understand that conditions can change especially in light of a well drilled several decades ago. However, if something changed from the original plan, the NPS should have been notified that conditions were different or that changes were needed prior to completion of the workover operation. We have not receive notification and hence the confusion about what is being planned compared to what was proposed.

The NPS requires operators to adhere to the state regulations governing plugging operations and the current plugging activities does not meet with the state's requirements. We understand that the RRC will require BNP to submit an updated plugging plan for their approval and address their concerns regarding the plugging that was accomplished several weeks ago. We request a copy of the updated plugging plan that is being submitted to the RRC.

With respect to drilling, the current approved plan for A3 only allows for the re-entry of the existing well bore for the purposes of extending or side-tracking the well to a new bottom hole location. Anything beyond this including drilling a new hole in the ground outside of the existing A3 well bore, which would constitute a new well, is not covered by the existing

plan and would require a new or amended plan and additional compliance. Until this is clarified, we are unable to continue the compliance documentation necessary to allow re-entry into A3.

If we can provide any additional information, please do not hesitate to call me.

Darrell

Darrell L. Echols
Chief, Science and Resources Management

Mailing Address:
National Park Service
Padre Island National Seashore
P.O. Box 181300
Corpus Christi, Texas 78480-1300

Delivery Address:
20301 Park Road 22
Corpus Christi, TX 78418

phone: (361) 949-8173, x223
fax: (361) 949-8023

E-mail: Darrell_Echols@nps.gov
Webpage: <http://www.nps.gov/pais>
