



Darrell Echols

11/07/2006 06:37 PM
CST

To: Dimitra Guerrero/PAIS/NPS@NPS
cc:
Subject: BNP Letter

Dimitra,

Here is the letter for Colin's review.

Thanks,
D



A3 workover.doc

Darrell L. Echols
Chief, Science and Resources Management

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United States Department of the Interior

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IN REPLY REFER TO:

L 3025

November 7, 2006

Mr. Paul Black
BNP Petroleum
2806 Post Oak Boulevard, Suite 5300
Houston, TX 77056

RE: Proposed deepening of the A3 well location.

On November 3, the National Park Service received notification that BNP proposed to re-enter the A3 well location with the objective of deepening the well and placing the well in production. It is our understanding that the well was conditioned several weeks ago in preparation for the Parker Rig currently drilling Kindee's ST 212 #1 well. However, 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 continued operations of the Dunn-McCampbell A3 well.

We have been notified by the Railroad Commission of Texas (RRC) that the A3 well may have been improperly plugged and if so, does not meet the plugging requirements outlined in the Statewide Rules for Oil, Gas, and Geothermal Operations. We have discussed this with the RRC and based on these conversations, examination of the logs completed by the workover rig, and examination of the A3 site location, it appears that the A3 well has been plugged. We understand that conditions can change during a workover operation especially in light of a well drilled several decades ago. If conditions 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 did not receive notification and hence the confusion about what is being planned compared to what was proposed.

As you know, the approval to operate a well with the park is conditioned upon the adherence to state and federal regulations and violations of those regulations could result in a suspension of an operation. 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 confusion can be



clarified, we are unable to continue the compliance documentation necessary to allow re-entry into A3.

If you need any additional information or assistance, please do not hesitate to contact Mr. Darrell Echols at (361) 949-8173 ext. 223.

Sincerely,

Colin W. Campbell
Superintendent

cc: Linda Dansby, NPS, IMSF-RMO