

Stogner, Michael

From: Stogner, Michael
Sent: Thursday, December 17, 1998 4:07 PM
To: Carroll, Rand; Williams, Chris; Chavez, Frank; Gum, Tim; Johnson, Roy
Cc: Catanach, David; Busch, Ernie; Ashley, Mark; Arrant, Bryan; Kautz, Paul; Hebert, Lyn
Subject: Rule 107

Rand,

I've reviewed your proposal and would only say that these changes may not go far enough to streamline the process and to shift responsibility to the Districts. I therefore propose the following:

107.J. Requirements for tubing of wells are as follows:

- (1) All flowing oil wells equipped with casing larger in size than 2 7/8-inch OD shall be tubed.
- (2) All gas wells equipped with casing larger in size than ~~2-7/8~~ 3 1/2 inch OD shall be tubed.
- (3) Tubing shall be set as near the bottom as practical and tubing perforations shall not be more than 250 feet above the top of the pay.
- (4) ~~The Division Director may~~ supervisor of the appropriate Division District Office, upon proper application, ~~may~~ grant administrative exceptions to the provisions of sub-paragraphs (2) and (3) above, ~~without notice and hearing, provided waste will not be caused thereby.~~
- (5) The supervisor, at his discretion, or an operator may request to have any application reviewed administratively by the Division Director whereby the operator shall submit appropriate information and give notice as requested by the Division Director. Unprotested applications may be approved administratively within 20 days of receipt of the application and supporting information. If the application is protested, or the Division Director decides that a public hearing is appropriate, the application may be set for public hearing.

107.K. REPEALED