

Harlow

Carroll, Rand

From: Gum, Tim
Sent: Friday, September 25, 1998 11:02 AM
To: Wrotenbery, Lori
Cc: Gum, Tim; Carroll, Rand
Subject: RE-HARLOW-WILLOW CHANGE OF OPERATOR

I received on 9/24/98 a cover letter(reflecting remedial work performed) from Gary Millspaugh (Willow pipeline)submitting C-103's on fifteen non-compliance wells (one C-103 /well , 3 copies each are required) during the period 3/1/96 to 9/30/98 . Each of the C-103's were very generic stating that the well was sand pumped giving no actual depths , amount of sand cleaned out or the date of work.

Per rule 1103 . G. Report of Remedial . The C-103 shall be filed within 30 days following the completion of such work stating a detail account of work done.

I am accepting the action of sand pumping under sub section (e) of 1103 . G as remedial work as very loosely reported in Willow's C-103's .

The stated work was performed over a 2 1/2 yr. period of 3/1/96 to 9/30/98 .

If the fifteen wells have no reported production or approved activity they all will be in non -compliance on 10/1/98.

Example of how Willow likes to operate is as follows:

- 1.)well reported on C-103 as being sand pumped,run tubing and rods and put on production.However , the 3/98 C-115 shows no production. A field inspection on 8/18/98 indicated no pumping unit , no tubing , no rods and no wellhead. It is very difficult to produce without these items.
- 2.)second well on C-103 reported that well was sand pumped run tubing and rods and that a pumping unit was not available . However , production was reported on the 3/98 C-115 .

I will approve the C-103's as submitted . However , I will not approve the C-104 change of operator until you receive your response from Willow and you give me the ok to approve them.

Please advise.

Thanks TWG.