

## Kellie Martinec

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**From:** Veronica Larson  
**Sent:** Wednesday, September 11, 2013 4:57 PM  
**To:** Leslie Savage  
**Subject:** FW: Informal Comments to Draft Forms (8/12/2013)

**Importance:** High

FYI

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**From:** Chapman, Chelsea R [<mailto:Chelsea.Chapman@epenergy.com>]  
**Sent:** Wednesday, September 11, 2013 4:40 PM  
**To:** Veronica Larson  
**Cc:** Gomez, Maria S; Morales, Lisa; Renken, Linda G  
**Subject:** Informal Comments to Draft Forms (8/12/2013)

Veronica,

Please find below our questions/comments regarding proposed amendments to Oil Well Potential Test, Completion or Recompletion Report, and Log (Form W-2) (all numbers correspond to new form numbers):

**15. Any condensate on hand at time of workover or recompletion?** Intent: Oil wells produce oil—not condensate. Does this question apply to Reclass filings only? If not, should it read: Any condensate/oil on hand at time of workover or recompletion?

**37. Recommendation of G.A.U.** Typo: Add period after U.

**40. If multiple completion, list all reservoir names (completions in this well) and Oil Lease or Gas ID No.** Typo: Add e to Lease.

**42. CASING REPORT** Format: Adjust column widths to better allow for responses.

**52. Are the producing intervals of this well associated with a non-exempt hydrogen sulfide field (SWR 36)?** Intent: Is a “non-exempt” field a field that requires an H-9?

**54. Shallowest Known Disposal/Injection Zone, Productive Zone, Potential Flow Zone, or Zone with Corrosive Formation Fluids** Intent: Shallowest known zone within the well or ¼ mile radius of well?

Also, we propose a change to the instructions however this may require a rule change. We propose that the “30 days after completing a well” be changed to read “30 days after turning a well to production.” In some instances, we do not produce wells immediately after completing them because of safety concerns and/or potential performance issues related to offset operations (like fracking the neighboring well). In these cases, we may not turn the well to production or have valid test data available within 30 days therefore we request the above-mentioned deadline change.

Lastly, we propose adding a “Copy” feature to allow operators to copy information from one filing to the next if we should file multiple W-2s for the same well (for different purposes like Well Record Only then Initial Potential).

Thank you for this opportunity to comment on the proposed amendments!

Thank you,

Chelsea Chapman  
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