Message

From: Frank Stevens [fas@incss.net]
Sent: 7/13/2020 9:31:24 PM
To: Urchel, Raymond [urchel.raymond@epa.gov]
Subject: Re: Chudy SWD

Hey Ray,

Do you have a contact in Chicago that maybe I should be speaking with?

It's our opinion we have done all that required by the permit, the well is in great condition and the MIT isn't due yet?

They only thing might be a fluid analysis, that only due when fluids are injected and that isn't occurring correct.

Columbus was never on our EPA permit just had permission to file reports and that permission was revoked in another letter to EPA.

Hope this is helpful, just want to make sure the filings are completed and accurate.

Thanks,
Frank

Sent from my iPhone

On Jul 13, 2020, at 2:52 PM, Urchel, Raymond <urchel.raymond@epa.gov> wrote:

I'm not a lawyer, so I'll pass on the below.

Chicago said make sure you read the well's Federal UIC permit and supply all information. Add an extra sheet, if required. It appears the well did not inject during the time. Was there fluid gain or loss during the period?

Be sure to track when the next MIT is needed. Ray Urchel

From: Frank Stevens <fas@incss.net>
Sent: Monday, July 13, 2020 3:40 PM
To: Urchel, Raymond <urchel.raymond@epa.gov>
Subject: Re: Chudy SWD

Ray,

The Chudy SWD state well permit in under Columbus Oil and Gas LLC the bankrupt Operator.

So the plan is to ask the court to compel the permit transfer unless the permit transfer is signed voluntarily. The Michigan EGLE was asked if a court ordered transfer was acceptable and they haven't responded.

I've not heard from Mark Snow recently at the Michigan EGLE and at last conversation it's was the state position that until the permit was signed nothing could be done at the state level.

So at this time all Stevens & Soldwisch can do is make our monthly filings as required. Now we do have another operating company ready to go once permits are ready. The plan is any day this could happen.

Does this all make sense?

Then you didn't explain why the forms is unacceptable? If I understand your prior email that it wasn't acceptable.

Thanks,
Frank

On Jul 13, 2020, at 2:03 PM, Urchel, Raymond <urchel.raymond@epa.gov> wrote:

Question – Do you plan for the Chudy 2 well to stay inactive for a specified time, say 6 months? If so, you can apply for temporary abandoned status with Michigan EGLE. Let me know. Ray

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From: Frank Stevens <fas@incss.net>
Sent: Monday, July 13, 2020 1:50 PM
To: Urchel, Raymond <urchel.raymond@epa.gov>
Subject: Re: Chudy SWD

Hi Ray,

The well has been monitored daily if you mean by observation and not injection of fluids.

Then the wells hasn't had any fuild injection.

Then if the "no" means the form isn't acceptable can you let me know the problems.

Thanks,
Frank

On Jul 13, 2020, at 12:31 PM, Urchel, Raymond <urchel.raymond@epa.gov> wrote:

Two questions.... Was there any injection into the Chudy 2 well from April through June?
Did you monitor the well weekly, as required?
Was there well fluid added or lost during the quarter?
No to the form, I've been told. Ray

From: Frank Stevens <fas@incss.net>
Sent: Sunday, July 12, 2020 8:00 PM
To: Urchel, Raymond <urchel.raymond@epa.gov>
Subject: Chudy SWD

Hi Ray,

Please find the signed Chudy SWD form need for both the monthly and quarterly filings.

Let me know if this is acceptable.

Thanks,
Frank