From:	Jonathan Rice
То:	Jonathan Rice
Subject:	2023 DNR.OC- potpourri for February and March comments requested
Date:	Friday, May 12, 2023 1:40:21 PM
Attachments:	February 2023 potpourri.pdf March 2023 Potpourri.pdf

From: C. Ellis Brown <ellis@bayoustateoil.com>

**Sent:** Friday, April 14, 2023 3:53 PM

To: Jonathan Rice <Jonathan.Rice@la.gov>

**Subject:** RE: 2023 Department of Natural Resources, Office of Conservation - potpourri for February and March comments requested

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good afternoon Mr Rice,

The definition of 'Natural Gas' in the March Potpourri seems wide open to interpretation and that does give me some angst.

I know that for the 240 active stripper oil wells that we operate, it would be detrimental to our operations if it is implemented with a broad brush to the trace amounts associated with our typical wells that produce 1.2 BOPD and 300 BWPD.

Please consider us against the proposed regulations in their current state.

Thanks, Ellis Brown President Bayou State Oil Corporation Shreveport, LA

From: C. Ellis Brown
Sent: Wednesday, March 29, 2023 9:01 AM
To: Jonathan Rice <<u>Jonathan.Rice@la.gov</u>>
Cc: Patrick Raley <<u>patrick.Raley@LA.GOV</u>>; Carrie Wiebelt <<u>carrie.wiebelt@la.gov</u>>;
'hortond@legis.la.gov' <<u>hortond@legis.la.gov</u>>; <u>hse001@legis.la.gov</u>; <u>sen36@legis.la.gov</u>
Subject: RE: 2023 Department of Natural Resources, Office of Conservation - potpourri for February and March comments requested

Mr. Rice,

I need to say that the SOA [Schedule of Abandonment] program has been appreciated by our company.

Ms. Wiebelt and Mr. Raley have been very helpful throughout the process.

The SOA has allowed us to direct the funds we were spending on inactive well assessment fees toward plugging wells on a yearly budgeted schedule.

I would hate to see this opportunity go away in the future.

Since our SOA on 4-13-2021, we have plugged 64 wells at a cost of \$166,000. 57 of the wells were on our SOA.

Conversely our Inactive Well Assessment Fees for 2016-17-18-19-20 totaled \$68,250.

Utilizing the SOA the Inactive Well Assessment Fees for 2021-22 totaled \$1,250.

We were able to direct the savings into plugging costs.

In summary, we would be opposed to the new rule if no new SOA's or extensions/renewals of existing SOA's were allowed.

I hope my comments are helpful.

Ellis Brown Bayou State Oil Corporation Shreveport, LA

From: Jonathan Rice <<u>Jonathan.Rice@la.gov</u>> Sent: Tuesday, March 28, 2023 4:05 PM

To: C. Ellis Brown <<u>ellis@bayoustateoil.com</u>>

**Subject:** RE: 2023 Department of Natural Resources, Office of Conservation - potpourri for February and March comments requested

That's correct.

Existing SOA's would remain in force, however there would be no new SOA's or extensions/renewals of existing SOA's under a new rule.

## Best regards,

F. Jonathan Rice, Attorney LDNR / Office of Conservation Phone: (225) 342-9660 Fax: (225) 342-3705 Jonathan.rice@la.gov

From: C. Ellis Brown <<u>ellis@bayoustateoil.com</u>>

Sent: Monday, March 27, 2023 10:38 AM

**To:** Jonathan Rice <<u>Jonathan.Rice@la.gov</u>>

**Subject:** RE: 2023 Department of Natural Resources, Office of Conservation - potpourri for February and March comments requested

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good morning Mr. Rice, Am I correct that these changes have no impact on our current Schedule of Abandonment [21-1197] approved 4-13-2021. Regards, Ellis Brown Bayou State Oil Corporation [0492]

From: Jonathan Rice <<u>Jonathan.Rice@la.gov</u>>
Sent: Monday, March 27, 2023 10:16 AM
Subject: 2023 Department of Natural Resources, Office of Conservation - potpourri for February and March comments requested

To: Oil & Gas Operators

Please see the attached February and March 2023 Potpourri editions published in the Louisiana Register for industry review and comment if desired. Thank you for your time and attention in this matter.

Best regards,

F. Jonathan Rice, Attorney LDXR / Office of Conservation Executive Division P.O. Box 94275 Baton Rouge, LA 70804-9275 Phone: (225) 342-9660 Fax: (225) 342-3705 *Jonathan.rice@la.gov* 

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