



**Gulf Coast Business Unit**  
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***Sent By E-Mail September 23, 2015***

City of League City, Texas  
300 West Walker Street  
League City, TX 77573  
Attn. Mark Linenschmidt

RE: Stewart Title & Guaranty Wells No. 6 & No. 1  
Lot 7 Block N, S.Austin Survey, Abstract A-3  
Galveston County, TX

Mark,

As discussed, ConocoPhillips Company (COP) was approached by the Texas Railroad Commission (TRRC) as a prior operator to restore oil field pits located on this property. During this project, two wells on this lease were found – wells no. 6 and no. 1. Through a search of TRRC records, it was determined that the no. 1 well had been properly plugged in 1959. No records were found to verify the plugged status of the no. 6 well.

COP has proceeded with plans to P&A the no. 6 well, and, as to the no. 1 well, cut off an additional 2-3'. As COP has no operations within League City, we were unaware of City permitting requirements. We have received a permit to P&A the no. 6 well from the TRRC (attached), & per conversation with Peter Fisher, TRRC District 5 Manager, no permit is required for the no. 1 to cut, but will be required in the event no cement is found at surface after being cut.

COP requests a variance to the permitting process of League City as to a plugging permit so that we can expeditiously complete this restoration project. We can modify our procedure to set the surface plug deeper as to allow the casing from the no. 6 well to be cut off 10' below ground as required by rule. As to the no. 1 well, this well was P&A'd prior to the enactment of the League City Oil & Gas rules and as such, we request a variance as to the cut off depth, unless it is determined a new surface plug must be placed in the well due to the lack of cement once this well is cut an additional 2-3'. As we were scheduled to proceed with this when we noted League City requirements, our project is on hold. Current weather is favorable to execute this project and it should only take less than a week. Plugging orphan wells like this benefits the City of League City and is encouraged by TRRC. As an alternative, this project might be authorized under the existing site restoration permit.

If you have any questions, give me a call or contact me at the address noted at the top.

Respectfully,

Richard Noble  
Regulatory Lead

cc: Diana Stapp City Secretary  
Richard Werbiskis, Assistant Director of Planning and Development