



**Jennifer Dixon**  
Regulatory Coordinator  
ConocoPhillips Company  
600 N. Dairy Ashford Rd  
EC3-12-W334  
Houston, TX 77079  
phone 832.486.3345

March 6, 2018

Julie Murphy, COGCC Director  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

Director Murphy:

In accordance with the Notice to Operators: interim Reclamation Procedures for Delayed Operations (January 5, 2017), ConocoPhillips Company (Operator Number 19160) respectfully requests approval for delay to interim reclamation for the State of Colorado 36-1H (Location 430689).

**1. Requested Length of Extension:**

ConocoPhillips requests an extension to the commencement of interim reclamation requirements to begin no later than December 31, 2018.

**2. Surface Owner Written Consent:**

The surface owner, Front Range I-70 Capital Assets LLC, has given consent to delay of interim reclamation operations to start no later than December 31, 2018 (see attached).

**3. Justification for Delay:**

ConocoPhillips, constructed this location in December of 2012. Due to capital constraints, the operator was unable to drill and complete the remaining wells associated with the previously planned Phase II expansion.

**4. Schedule of Operations:**

ConocoPhillips Company currently plans to perform the additional required interim reclamation on this location at the time that the ConocoPhillips's reclamation crews return to the geographical region to perform final reclamation on the State of Colorado 36-1 (Location 430595), scheduled for P&A in 2018. Reclamation activities should begin around 9/1/2018.

**5. Location Compliance:**

The State of Colorado 36-1H (Location 430689) is compliant and will remain in compliance with COGCC Rule 1002.f (Stormwater Management), and housekeeping requirements outlined in Rule 1003.a. and 1003.f.

**6. Cost of Interim Reclamation:**

ConocoPhillips' third-party contractor estimates that interim reclamation for this location will cost approximately \$66,000 (see attached).

**7. COGCC Operator Rule 1003 Tolling Agreement:**

In addition to this variance, ConocoPhillips respectfully requests that the COGCC agrees to and accepts the attached "COGCC Operator Rule 1003 Tolling Agreement."

Upon approval of this request and the COGCC-Operator Rule 1003 Tolling Agreement, ConocoPhillips will post a sign on the location indicating that a delay to the commencement of interim reclamation has been approved with a no later than start date and will increase Financial Assurance on this location to \$66,000.00.

Respectfully,

A handwritten signature in black ink, appearing to read "Jennifer A. Dixon".

Jennifer A. Dixon

Regulatory Coordinator

ConocoPhillips, Rockies BU



**COLORADO**

**Oil & Gas Conservation  
Commission**

Department of Natural Resources

## COGCC Operator Rule 1003 Tolling Agreement

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Operator Name and No. ("Operator"): ConocoPhillips Company (19160)

Interim Reclamation Variance Request Doc. No.: 401566527

Date of Submission of Interim Reclamation Variance Request: 3/9/2018

Location Nos. Impacted by the Variance Request ("Impacted Locations"): 430689

*This Agreement is offered by COGCC so that the Operator has an opportunity to come into compliance in accordance with its Interim Reclamation Variance Request.*

If the Interim Reclamation Variance Request referenced above is approved ("Approved Variance"), COGCC agrees not to issue a Notice of Alleged Violation ("NOAV") for a violation of Rule 1003 at the Impacted Locations before the expiration of the Approved Variance. In exchange, the Operator agrees to the following:

The Oil and Gas Conservation Act's statute of limitations, §34-60-115, C.R.S., is tolled for any existing or potential claims related to interim reclamation at the Impacted Locations from the submission date of the approved Variance until the Operator successfully completes interim reclamation in accordance with Rule 1003 or until the expiration of the Approved Variance, whichever occurs first.

COGCC reserves the right to issue an NOAV for a violation of Rule 1003 if the Operator does not comply with the Approved Variance or its conditions of approval.

**AGREED TO AND ACCEPTED:**

COGCC  
Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Signatory Name and Title

Operator  
Date:  
3/9/2018

Jennifer Dixon  
\_\_\_\_\_  
Signature of Authorized Operator  
Representative

Jennifer Dixon, Regulatory Coordinator  
\_\_\_\_\_  
Print Signatory Name and Title



January 10, 2018

Mr. Jeff Smith  
Front Range I-70 Capital Assets LLC  
500 106<sup>th</sup> Avenue NE, Unit 3815  
Bellevue, WA 98004-8694

**RE: REQUEST FOR SURFACE OWNER CONSENT FOR EXTENSION OF  
INTERIM RECLAMATION ACTIVITIES**

Dear Mr. Smith:

Due to operational constraints, we are requesting that you grant approval to allow ConocoPhillips to delay additional interim reclamation activities on the following location:

Location Name	Land Description	Agreed Upon Interim Reclamation Start Date
State of Colorado 36-1H	SE/4 of Sec. 36-T3S-R64W	December 31, 2018

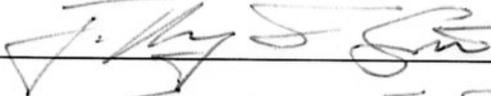
If you are in agreement with this request, please indicate so by signing in the space below.

Thank you for your consideration in this matter. If there are any questions or concerns that you would like to discuss or if any additional information is required, please advise.

Sincerely,

Darrel C. Vanhooser, SR/WA  
Contingent Worker for ConocoPhillips

AGREED TO AND ACCEPTED THIS 23<sup>RD</sup> DAY OF FEBRUARY, 2018

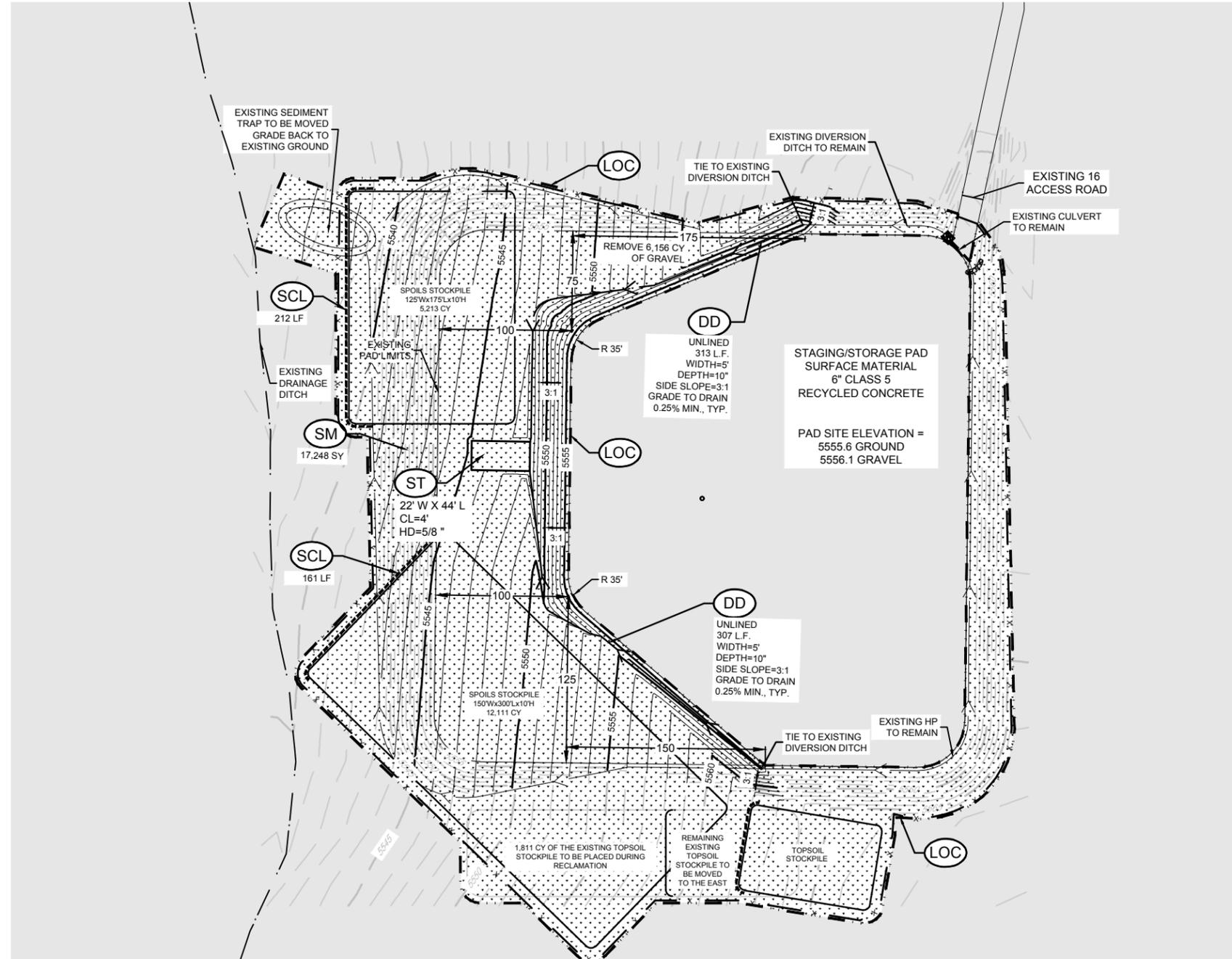
By: 

Printed Name: JEFFREY J. SMITH

Title: MANAGING MEMBER  
FRONT RANGE I-70 CAPITAL ASSETS, LLC



SCALE: 1" = 100



BMP LEGEND

SEDIMENTATION BASIN	SB	
OUTLET PROTECTION	OP	
CULVERT INLET PROTECTION	CIP	
TEMPORARY SEEDING	PS	
DIVERSION DITCH	DD	
LIMITS OF CONSTRUCTION	LOC	
REINFORCED ROCK BERM	RRB	
SILT FENCE	SF	
EXISTING ELEVATION	(5560.69)	
PROPOSED ELEVATION	5560.69	

LOC (INCLUDES LIMITS OF CLEARING & GRADING FOR THE WELL PAD & ACCESS ROAD. LOC ALSO ENCOMPASSES STOCKPILE AREA(S))

- NOTE:
- SEE THE STANDARD NOTES AND DETAILS IN FIELD WIDE REPORT, REVISED JANUARY 2010 (3 SHEETS) FOR ALL STANDARD DETAILS, NOTES AND LEGENDS OF BMP NAMES AND SYMBOLS.
  - QUANTITIES:  
 EXISTING GRADE AT WELL HEAD: 5557.33'  
 PAD SITE ELEVATION = 5555.6' (GROUND), 5556.1' (GRAVEL)  
 CUT SLOPES = 3:1  
 FILL SLOPES = 3:1  
 RECLAMATION TOPSOIL = 1,811 CY TO BE PLACED  
 RECLAMATION TOTAL CUT = 18,504 CY (DOES NOT INCLUDE TOPSOIL)  
 RECLAMATION TOTAL FILL = 359 CY (INCLUDES 10% ADJUSTMENT FOR COMPACTION)  
 RECLAMATION GRAVEL BASE AT 6" DEPTH = 5,735 CY  
 RECLAMATION TOTAL DISTURBED AREA = 3.56 ACRES  
 RECLAMATION PAD AREA = 2.37 ACRES  
 RECLAMATION FENCED AREA = 5.78 ACRES
  - ALL DIVERSION DITCHES ARE ANTICIPATED TO BE UNLINED.
  - ALL BMP'S SHOWN WILL BE INSTALL IN THE INITIAL PHASE UNLESS LABELED OTHERWISE. BMP'S WITH "PP" ARE IN THE POST PAVING PHASE.
  - SURFACING MATERIAL SUSTAINING 160,000 POUND IMPOSED WEIGHT LIMIT ON SITE ACCESS ROAD SHALL ALSO BE DISTRIBUTED THROUGHOUT THE ENTIRE SITE, PROVIDING EMERGENCY APPARATUS ACCESS TO ALL PROPOSED STRUCTURES WITHIN THE SITE.

SHEET NUMBER	<b>5B</b>	DRAWN BY:	BSC	SCALE:	1"=100'
		CHECKED BY:	MEL	FILE NO.:	8.13.0201601
		DATE:	JAN 22, 2018		
		STATE OF COLORADO ADAMS #36-1H WELL EROSION AND SEDIMENT CONTROL PLANS RECLAMATION PLAN			
		CONOCOPHILLIPS COMPANY ATTN: MAXWELL BLAIR 34501 E. QUINCY AVE. WATKINS, CO 80137 720-862-4503			
		10335 E. Dry Creek Avenue Englewood, CO 80112 Tel: (720) 482-9526 Fax: (720) 482-9546			
		No. Revisions		Date	Appr.

**From:** Terry Duncan  
**To:** [Dixon, Jennifer A](mailto:Dixon.Jennifer.A)  
**Subject:** [EXTERNAL]RE: ConocoPhillips Quote  
**Date:** Tuesday, February 6, 2018 10:58:02 AM

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Sending on behalf of David Duncan:

Good morning Jennifer,

The total amount in 2017 was \$107,035.70, which was for a total of 47 sites, which averaged \$2,277.36. However, sites are different sizes and have different needs. Some sites cost more and some sites cost less.

Please contact David Duncan should you have any questions.

Terry Duncan  
303-798-4090

-----Original Message-----

From: Dixon, Jennifer A [<mailto:Jennifer.A.Dixon@conocophillips.com>]  
Sent: Monday, February 05, 2018 12:02 PM  
To: [ww@weedwranglers.com](mailto:ww@weedwranglers.com)  
Subject: ConocoPhillips Quote

Hi David,

Thanks for taking my call today. As I mentioned, I need to provide the COGCC some basis to calculate the cost of weed mitigation on our locations per year. If you could provide me a generic quote based on the work you have preformed for us in 2017, I would be very appreciative.

Respectfully,

Jennifer Dixon  
RBU-Regulatory Coordinator  
Office - 832-486-3345  
Cell - 701-300-2381  
[jennifer.a.dixon@conocophillips.com](mailto:jennifer.a.dixon@conocophillips.com)

-----Original Message-----

From: Aldrich, Brian C.  
Sent: Monday, February 5, 2018 10:59 AM  
To: Dixon, Jennifer A <[Jennifer.A.Dixon@conocophillips.com](mailto:Jennifer.A.Dixon@conocophillips.com)>  
Subject: Weed Wranglers

Jennifer,

This is the contact info for Weed Wranglers. They currently do all of our weed mitigation.

David Duncan

303-798-4090

Dave Kelt  
720-391-1611

Sent from my iPhone



Integrated Energy Services

Client: Conoco Phillips - Niobrara  
 Project: State of Colorado 36-1 H Reclaim Interim  
 Crossfire Job # \_\_\_\_\_

**T&M Rate Price**

SCHEDULE OF VALUES					Quantity	Units	CF MH	3rd Party MH	Line Item Total
1.0	State of Colorado 36-1 H Reclaim Interim								
	State of Colorado 36-1 H Reclaim Interim	1	LS	250	0			\$ 60,921.39	
1.0	State of Colorado 36-1 H Reclaim Interim			250	0			\$ 60,921.39	
				250	0				
<b>GRAND TOTAL</b>						MH	250		\$ 60,921.39

Location Name	Location ID	Representative API	Recontouring - Cubic Yard material movement	Dirt work recontouring Costs	Soil amendments Costs	Seedbed prepartaion and seeding activity Cost	Seedbed stabilization (eg Mulch) Costs	Other erosion controls Costs	Weed control Min. two growing seasons Costs	Total interim reclamation Costs	Total disturbed acorage	Interim reclamation acorage delayed	Final Acentage for production activities
State of Colorado 36-1	430689	05-001-09760	24598	\$ 56,215.54	\$ 27.23	\$ 2,520.50	\$ 2,158.12		\$5,000.00	\$ 65,921.39	9.32	3.56	5.76