

**State of Colorado**  
**Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



|                                      |    |    |    |
|--------------------------------------|----|----|----|
| DE                                   | ET | OE | ES |
| Document Number:<br><b>401675762</b> |    |    |    |
| Date Received:<br><b>06/16/2018</b>  |    |    |    |

**SUNDRY NOTICE**

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

OGCC Operator Number: 74165 Contact Name Edward Ingve  
 Name of Operator: RENEGADE OIL & GAS COMPANY LLC Phone: (303) 829-2354  
 Address: 6155 S MAIN STREET #210 Fax: (303) 680-4907  
 City: AURORA State: CO Zip: 80016 Email: ed@renegadeoilandgas.com

Complete the Attachment  
Checklist

OP OGCC

API Number : 05- 039 06349 00 OGCC Facility ID Number: 209444  
 Well/Facility Name: MILLER Well/Facility Number: 6-13  
 Location QtrQtr: SWSW Section: 6 Township: 6S Range: 62W Meridian: 6  
 County: ELBERT Field Name: COMANCHE CREEK  
 Federal, Indian or State Lease Number: \_\_\_\_\_

|                     |  |  |
|---------------------|--|--|
| Survey Plat         |  |  |
| Directional Survey  |  |  |
| Srvc Eqpmt Diagram  |  |  |
| Technical Info Page |  |  |
| Other               |  |  |

**CHANGE OF LOCATION OR AS BUILT GPS REPORT**

☐ Change of Location \* ☐ As-Built GPS Location Report ☐ As-Built GPS Location Report with Survey

\* Well location change requires new plat. A substantive surface location change may require new Form 2A.

**SURFACE LOCATION GPS DATA** Data must be provided for Change of Surface Location and As Built Reports.

Latitude \_\_\_\_\_ PDOP Reading \_\_\_\_\_ Date of Measurement \_\_\_\_\_  
 Longitude \_\_\_\_\_ GPS Instrument Operator's Name \_\_\_\_\_

**LOCATION CHANGE (all measurements in Feet)**

Well will be: \_\_\_\_\_ (Vertical, Directional, Horizontal)

Change of **Surface** Footage **From** Exterior Section Lines:

Change of **Surface** Footage **To** Exterior Section Lines:

Current **Surface** Location **From** QtrQtr SWSW Sec 6

New **Surface** Location **To** QtrQtr \_\_\_\_\_ Sec \_\_\_\_\_

Change of **Top of Productive Zone** Footage **From** Exterior Section Lines:

Change of **Top of Productive Zone** Footage **To** Exterior Section Lines:

Current **Top of Productive Zone** Location **From** Sec \_\_\_\_\_

New **Top of Productive Zone** Location **To** Sec \_\_\_\_\_

Change of **Bottomhole** Footage **From** Exterior Section Lines:

Change of **Bottomhole** Footage **To** Exterior Section Lines:

Current **Bottomhole** Location Sec \_\_\_\_\_ Twp \_\_\_\_\_

New **Bottomhole** Location Sec \_\_\_\_\_ Twp \_\_\_\_\_

Is location in High Density Area? \_\_\_\_\_

Distance, in feet, to nearest building \_\_\_\_\_, public road: \_\_\_\_\_, above ground utility: \_\_\_\_\_, railroad: \_\_\_\_\_,

property line: \_\_\_\_\_, lease line: \_\_\_\_\_, well in same formation: \_\_\_\_\_

Ground Elevation \_\_\_\_\_ feet Surface owner consultation date \_\_\_\_\_

| FNL/FSL |           | FEL/FWL    |     |
|---------|-----------|------------|-----|
| 660     | FSL       | 660        | FWL |
|         |           |            |     |
| Twp 6S  | Range 62W | Meridian 6 |     |
| Twp     | Range     | Meridian   |     |
|         |           |            |     |
|         |           |            | **  |
| Twp     | Range     |            |     |
| Twp     | Range     |            |     |
|         |           |            |     |
|         |           |            | **  |
|         |           |            |     |
|         |           |            |     |

\*\* attach deviated drilling plan

**CHANGE OR ADD OBJECTIVE FORMATION AND/OR SPACING UNIT**

| <u>Objective Formation</u> | <u>Formation Code</u> | <u>Spacing Order Number</u> | <u>Unit Acreage</u> | <u>Unit Configuration</u> |
|----------------------------|-----------------------|-----------------------------|---------------------|---------------------------|
|                            |                       |                             |                     |                           |

**OTHER CHANGES**

☐ **REMOVE FROM SURFACE BOND** Signed surface use agreement is a required attachment

☐ **CHANGE OF WELL, FACILITY OR OIL & GAS LOCATION NAME OR NUMBER**

From: Name MILLER Number 6-13 Effective Date: \_\_\_\_\_

To: Name \_\_\_\_\_ Number \_\_\_\_\_

☐ **ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.**

☐ WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number \_\_\_\_\_ has not been drilled.

☐ PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number \_\_\_\_\_ has not been constructed (Permitted and constructed pit requires closure per Rule 905)

☐ CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number \_\_\_\_\_ has not been constructed (Constructed facility requires closure per Rule 908)

OIL & GAS LOCATION ID Number: \_\_\_\_\_

☐ Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

☐ Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

**Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.**

☐ **REQUEST FOR CONFIDENTIAL STATUS**

☐ **DIGITAL WELL LOG UPLOAD**

☐ **DOCUMENTS SUBMITTED** Purpose of Submission: \_\_\_\_\_

**RECLAMATION****INTERIM RECLAMATION**

☐ Interim Reclamation will commence approximately \_\_\_\_\_

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

**Field inspection will be conducted to document Rule 1003.e. compliance**

**FINAL RECLAMATION**

☐ Final Reclamation will commence approximately \_\_\_\_\_

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

☐ Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

**Field inspection will be conducted to document Rule 1004.c. compliance**

Comments:

#### ENGINEERING AND ENVIRONMENTAL WORK

##### ☐ NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below or provide as an attachment, as required by Rule 319.b.(3).

Date well temporarily abandoned \_\_\_\_\_ Has Production Equipment been removed from site? \_\_\_\_\_

Mechanical Integrity Test (MIT) required if shut in longer than 2 years. Date of last MIT \_\_\_\_\_

☐ SPUD DATE: \_\_\_\_\_

#### TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

☒ NOTICE OF INTENT Approximate Start Date 06/16/2018

☐ REPORT OF WORK DONE Date Work Completed \_\_\_\_\_

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Intent to Recomplete (Form 2 also required) | <input checked="" type="checkbox"/> Request to Vent or Flare  | <input type="checkbox"/> E&P Waste Mangement Plan      |
| <input type="checkbox"/> Change Drilling Plan                        | <input type="checkbox"/> Repair Well  | <input type="checkbox"/> Beneficial Reuse of E&P Waste |
| <input type="checkbox"/> Gross Interval Change                       | <input type="checkbox"/> Rule 502 variance requested. Must provide detailed info regarding request. |  |
| <input type="checkbox"/> Other _____                                 | <input type="checkbox"/> Status Update/Change of Remediation Plans for Spills and Releases          |  |

#### COMMENTS:

Request to flare is being made as a result of Anadarko shutting down their Third Creek System which was the gas sales outlet for the Miller 6-13. It is estimated that approximately 3 MCFD from the well will be flared using a central tank battery combustor. A trace amount (1 PPM) of hydrogen sulfide is present in the gas. A gas analysis from the lease meter is attached.

#### CASING AND CEMENTING CHANGES

| Casing Type | Size | Of | / | Hole | Size | Of | / | Casing | Wt/Ft | Csg/LinTop | Setting Depth | Sacks of Cement | Cement Bottom | Cement Top |
|-------------|------|----|---|------|------|----|---|--------|-------|------------|---------------|-----------------|---------------|------------|
|             |      |    |   |      |      |    |   |        |       |            |               |                 |               |            |

#### H2S REPORTING

**Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.**

**Gas Analysis Report must be attached.**

H2S Concentration: \_\_\_\_\_ in ppm (parts per million) Date of Measurement or Sample Collection \_\_\_\_\_

Description of Sample Point:

Absolute Open Flow Potential \_\_\_\_\_ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: \_\_\_\_\_

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: \_\_\_\_\_

COMMENTS:

### **Best Management Practices**

**No BMP/COA Type**

**Description**

#### **Operator Comments:**

This flaring request is made necessary by the shutting down of the Anadarko Third Creek Gathering System. The Miller 6-13 was making approximately 1 BOPD and 3 MCFD when the shut in took place. Oil revenue dominates the economics of this well. At this early stage of the shut in no timely alternatives appear viable to reestablish beneficial gas deposition and the length of this request to flare is unknown at this time.

- The flaring units being purchased and installed are the standard Cimarron Equipment 98%+ enclosed combustors. Renegade has recently purchased 15 units and is seeking more.

- At this point we have no idea if or when the wells will be reconnected to a pipeline. Obviously the most desirous outcome would be the reopening of the Third Creek System by Anadarko, a third party or a producer consortium. Lacking clarity of what is likely to happen, any date would be nothing but a guess. If Third Creek is not reopened, the dates for reconnecting to pipeline will be different for each lease but will almost certainly be over a year if at all.

- Renegade initially explored unsuccessfully if there were any easy ways to monetize the flared gas. Most options considered were expensive and uneconomic, difficult, requiring long regulatory approval and long construction lead times. At this stage of the shut in, committing to this level of evaluation is not practical especially in light of not knowing the future pipeline options. These types of creative gas uses will first likely be considered and employed at other more prolific Renegade leases which are not able to be flared.

- Any flaring will be compliant to all CDPHE requirements. An environmental consultant has been deployed to assist in securing all necessary permits.

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: \_\_\_\_\_

Print Name: Edward Ingve

Title: Manager/Owner

Email: ed@renegadeoilandgas.com

Date: 6/16/2018

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: ELLSWORTH, STUART

Date: 9/28/2018

**CONDITIONS OF APPROVAL, IF ANY:****COA Type****Description**

1) Flaring of natural gas shall comply with COGCC Rule 912.  
2) Metered flaring volumes must also be reported on the Operators Report of Monthly Operations, Form 7.  
3) Until designated otherwise by CDPHE, this gas will be considered as gas coming from the separator. Therefore, the operator is required to obtain and maintain any required air permits from CDPHE for separator gas.  
4) Operator will use an enclosed combustion device with a 98% design destruction efficiency for hydrocarbons. Wells are to be managed so that production volumes do not exceed combustor capacity.  
5) Provide the local emergency dispatch or the local governmental designee prior notice of natural gas flaring by supplying them with the approved Sundry Notice and all attachments. If any changes are made regarding this Sundry or the flaring protocol, local government designee and emergency dispatch are to be notified prior to flaring when flaring can be reasonably anticipated, or as soon as possible, but in no event more than two (2) hours after the flaring occurs.  
6) This approval is good for until October 1, 2019. A new application will be required to continue flaring be submitted.

**General Comments****User Group****Comment****Comment Date**

Stamp Upon  
Approval

Total: 0 comment(s)

**Attachment Check List****Att Doc Num****Name**

|           |                                   |
|-----------|-----------------------------------|
| 401675762 | SUNDRY NOTICE APPROVED-VENT_FLARE |
| 401675792 | GAS ANALYSIS REPORT               |
| 401777857 | FORM 4 SUBMITTED                  |

Total Attach: 3 Files