



COGCC Rule 502.b  
Variance Request for  
1001.c Surface Owner Waiver

Well Name: Ford 23-13  
Wellhead and Tank Battery  
API #: 05-123-21771      Location ID: 332053

Prepared for: PDC  
Energy Inc.

Prepared by:  
Duraroot, LLC  
SolSpec, LLC

Date:  
November 2018



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November 12, 2018

Director Julie Murphy  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**RE: COGCC Rule 502.b Variance Request for 1001.c Surface Owner Waiver**  
**Well Name: Ford 23-13      API #: 05-123-21771      Location ID: 332053**  
**Ford 23-13 Tank Battery**  
**Township 5 North, Range 64 West, 6<sup>th</sup> P.M.**  
**Section 13: SESW**  
**Weld County, Colorado**

Dear Director Murphy,

PDC Energy, Inc. (PDC) has obtained a Surface Owner Waiver under Rule 1001.c for final reclamation of the Ford 23-13 former tank battery (Location ID: 332053). PDC has plugged and abandoned (P&A) the wellhead and reclaimed the well pad in accordance with the requirements of Rule 1004.a. Furthermore, in accordance with the surface owner's request (see Attachment A), PDC has left the tank battery pad (approximately 0.16 acres) and surface stabilizing gravel in place. Under this agreement with the surface owner, PDC has removed both access points and accompanying roadside ditch culverts (2). The surface owner has installed a new access point with and culvert to access this property. The surface owner has plans to build a shop on the existing ground.

Due to the surface owner's final reclamation requests of the location, we are requesting your approval for a variance from the requirements of Rule 1004.a, Rule 1004.c (1), and Rule 1004.d pursuant to Rule 1001.c. The documents attached to this letter for the former Ford 23-13 wellhead and tank battery (Location ID: 332053) were developed in accordance with the December 17, 2015, version of the COGCC Rule 1001.c: Reclamation Variances and Waivers guidance document (Guidance Document).

**Attachment A: Executed Final Reclamation Agreement**

Attachment A is a signed and executed agreement that PDC has entered with the surface owner (Mr. Scot A. Reynolds) regarding the location's final reclamation efforts and the request to leave the tank battery and gravel surfacing in place. Attachment A, along with Exhibit A, fulfills the five (5) requirements listed in Section I of the Guidance Document.

**Attachment B: Operator Demonstration**

Attachment B, along with all figures and Exhibits A and B, fulfills the eight (8) requirements of Section II.B in the Guidance Document to waive compliance with specified provisions of Rule 1004, via a Variance. Attachment B contains the required supporting documentation to demonstrate that granting this final reclamation variance for applicable requirements of Rule 1004 will not negatively impact public health, public safety, public welfare, the environment, or wildlife.

PDC has made a good faith effort to provide the necessary information and evidence requested in the December 17, 2015, version of the COGCC Rule 1001.c: Reclamation Variances and Waivers guidance document for the Director to evaluate our request for waiving specified provisions of Rule 1004 to fulfill the surface owner's request for final reclamation.

If you have any questions or concerns about PDC's variance request, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Phillip Porter". The signature is written in a cursive style with a long horizontal stroke at the end.

Phillip Porter - Senior EHS Representative  
PDC Energy, Inc.

Attachments:

- Attachment A: Executed Final Reclamation Agreement
- Attachment B: Operator Demonstration
- Exhibit A: Facility Maps and Photos
- Exhibit B: Approved Well Abandonment - Subsequent Form 6

**Attachment A:**  
**Executed Final Reclamation Agreement**



District Office  
4000 Burlington Avenue  
Evans, CO 80620  
970-506-9272  
www.pdce.com

July 10, 2018


Scot A. Reynolds  
29436 County Road 388  
Kersey, CO 80644

Re: **Final Reclamation Agreement**  
API #: 05-123-21771 (Ford 23-13)  
Township 5 North, Range 64 West, 6th P.M.  
Section 13: Part of SW4  
Weld County, Colorado

Dear Mr. Reynolds:

PDC Energy, Inc. ("PDC") has previously consulted with you concerning the final reclamation of the above-captioned well(s) in accordance with your direction concerning future use of the land and applicable rules of the Colorado Oil and Gas Conservation Commission ("COGCC"). The well(s) were plugged and abandoned on December 11, 2017 and PDC has removed all associated well and production facility equipment from the site(s). Pursuant to COGCC Rule 1001.c, PDC and the Surface Owner, agree to enter into this Final Reclamation Agreement in order to set forth the respective rights and responsibilities of the parties, and to seek COGCC's waiver of compliance with certain 1000-series rules.

The specific portion of the oil and gas location, see attached photographs labeled as Exhibit A (the "Location") subject to this Final Reclamation Agreement and waiver include:

- Former tank battery area 
- ~~Former access points (2) to tank battery including both culverts thereunder~~ DB R
- Surface stabilization materials (gravel)

The reasons for Surface Owner entering into this Final Reclamation Agreement and thereby waiving PDC's obligations for additional reclamation required under COGCC Rule 1004 at the Location include:

- Surface Owner requests to retain the former battery site and both access points off of County Road 388 into the subject property. Surface Owner is planning for future shop construction on former battery site area, and currently only access into subject field and only access large enough for heavy farm equipment to exit and enter.

As the Surface Owner, you acknowledge that the current condition of the property subject to this Final Reclamation Agreement is satisfactory to you. If applicable, you acknowledge responsibility of topsoil protection. Additionally, by executing this letter below, as the Surface Owner, you also acknowledge that you knowingly, and forever, waive all reclamation protections otherwise afforded by COGCC Rule 1004 and that you will assume responsibility for any further reclamation activities you wish to have undertaken

at these sites. Provided however, PDC must comply with all final reclamation requirements under the Rule 1000-series that may not be waived by Surface Owner including COGCC Rule 1004.c.(4-5).

If this Final Reclamation Agreement correctly reflects your agreement, please sign, date, and have your signature notarized on both originals of this letter, keep one for your files and return one to the undersigned.

Please be aware that although you have signed this Final Reclamation Agreement and PDC subsequently submits a reclamation variance request, the COGCC may deny such request and PDC will then be required to complete all final reclamation in accordance with the COGCC 1000 Series rules. PDC is responsible for surface stabilization, stormwater management, and weed control until the variance request is approved

Thank you for your time and consideration in this matter. If you have any questions or comments, please contact me at (970) 342-0564.

Respectfully,

*Danielle Barnes*

Danielle Barnes  
Surface Landman

I acknowledge and agree as set forth above.

**Scot Reynolds**

Signed: *Scot Reynolds*  
Scot Reynolds

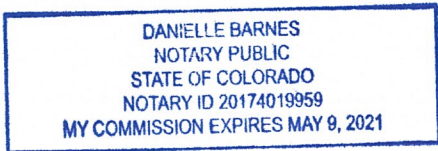
Date: 7/11/2018

**ACKNOWLEDGEMENTS**

State of Colorado )  
 ) §  
County of Weld )

On this 11 day of July, 2018, before me personally appeared **Scot Reynolds**, known to me to be the persons described in and who executed the foregoing instrument, and who acknowledged to me that they executed the same.

(SEAL)



My commission expires: May 9, 2021

*Danielle Barnes*  
Notary Public

**Exhibit A**



**View point looking southwest into subject property from County Road 388 of northern access point and former battery site.**



**View point looking northwest into subject property from County Road 388 of southern access point and former battery site.**

**Weld County  
Access Roads**

If you have elected for limited reclamation and would like to keep a road that either PDC built or an existing road that PDC upgraded and used while our well was in production, please note the following.

Weld County Code may require you to hold a current Access Permit for any access off of a county road onto your property. Currently, there is not an existing Weld County Access Permit for this access.

Permit Number: N/A

Use: N/A

To apply for a new Access Permit or change the use of the above referenced existing Access Permit with Weld County, please contact:

Weld County Public Works Department  
1111 H Street  
PO Box 758  
Greeley, CO 80632  
970-340-6496

Or visit the Weld County website to find the Access Permit Application and to learn more about Access Permits and requirements for approval at:

[www.weldgov.com/departments/public\\_works](http://www.weldgov.com/departments/public_works)

**Attachment B:**  
**Operator Demonstration**

## Attachment B



July 20, 2018

**RE: Operator Demonstration for the Ford 23-13 Former Tank Battery Location  
Location ID: 332053  
Township 5 North, Range 64 West, 6<sup>th</sup> P.M.  
Section 13: SESW  
Weld County, Colorado**

The information below addresses the requirements detailed in Section II.B of the Colorado Oil and Gas Conservation Commission's (COGCC) Rule 1001.c: Reclamation Variances and Waivers guidance document (Guidance Document) dated December 17, 2015. Section II.B of the Guidance Document outlines the evaluation of whether public health, safety, and welfare are protected and how significant adverse environmental impacts are prevented if specified provisions of Rule 1004 are waived, via a Variance.

**Section II.B.1 – Evidence that all wells on the location have been Plugged and Abandoned (P&A) and that a Form 6 subsequent was submitted for each well.**

PDC Energy, Inc. (PDC) certifies that the former Ford 23-13 wellhead (Location ID: 332053) has been P&A as per the COGCC Rules and the Form 6 Subsequent has been submitted and approved (Exhibit B: Document Number: 401360602).

**Section II.B.2 – Evidence that all oil and gas equipment has been removed, including flowline and gathering risers.**

PDC certifies that all oil and gas equipment, including flowline and gathering risers, has been removed from the location where the final reclamation variance is being requested. One exception is a meter shed that does not belong to PDC and is still in service. Exhibit A consists of aerial imagery and facility photos taken on July 13, 2018, that demonstrate all equipment has been removed apart from the operating meter shed.

**Section II.B.3 – Evidence that all trash and debris belonging to the operator or its agents has been removed.**

PDC certifies that all trash and debris belonging to PDC or any of our contractors or agents has been removed from the location where the final reclamation variance is being requested. Exhibit A consists of aerial imagery and facility photos taken on July 13, 2018, that demonstrate all trash and debris has been removed.

**Section II.B.4 – Evidence that noxious weeds have been controlled as required by Rule 1004.**

PDC certifies that noxious weeds have been controlled and/or removed from the location and will be managed by PDC until approval of this final reclamation variance. Exhibit A consists of

aerial imagery and facility photos taken on July 13, 2018, that demonstrate noxious weed control on the location.

**Section II.B.5 – Documentation of Good Faith Surface Owner Consultation regarding final reclamation pursuant to Rule 306.f.**

Attachment A, accompanied by Exhibit A, provides the “Final Reclamation Agreement” provided to and signed by the surface owner (Mr. Scot A. Reynolds) on July 11, 2018, for the Ford 23-13 former tank battery location documenting good faith consultation with the surface owner.

**Section II.B.6 – Documentation of existing state of reclamation.**

PDC certifies that the location has been reclaimed in accordance with the request of the surface owner (see Attachment A). The surface owner requested that PDC not reclaim the Ford 23-13 former tank battery pad. P&A for the Ford 23-13 wellhead was initiated on December 11, 2017, and all associated well and production facility equipment has been removed. Areas requiring reclamation as per COGCC Rule 1004 include:

- Former Ford 23-13 wellhead
- Former tank battery location (approximately 0.16 acres) with access points (2)

Exhibit A consists of aerial imagery and facility photos taken on July 13, 2018, that demonstrate the existing state of reclamation on the Ford 23-13 former tank battery and wellhead.

**Section II.B.7 – Evidence that site is stabilized and stormwater management is adequate pending COGCC’s final sign-off reclamation inspection.**

The Ford 23-13 former tank battery location is on the east edge of an agricultural field, between the field and County Road 388. The former tank battery is protected with residual roadbase material that stabilizes the soil for the landowner’s intended use. The Ford 23-13 former tank battery is located on level topography with minimal grade and is bordered on three (3) sides by perennial vegetation that serves as a vegetative buffer.

The former tank battery location is more than 1,500 feet from the nearest surface water body and is not within a defined FEMA, State, or Weld County 100-Year Floodplain or wetland. PDC will maintain the location to ensure proper stabilization and stormwater management until this variance is approved and all conditions of approval are fulfilled. Exhibit A consists of aerial imagery and facility photos taken on July 13, 2018, that demonstrate current site conditions, including adequate site stabilization and stormwater management.

**Section II.B.8 – Operator analysis of protection of public health, safety, and welfare; and prevention of significant adverse environmental impacts.**

PDC has evaluated potential impacts to public health, safety, and welfare as well as potential significant adverse environmental impacts to this final reclamation variance to Rule 1004 [except Rules 1004.c.(4) and 1004.c.(5)]. Based on the explanation below, PDC has determined that a variance from the applicable requirements of Rule 1004 for the Ford 23-13 former tank

battery (Location ID: 332053) would have NO NEGATIVE IMPACTS on public health, public safety, public welfare, environment, or wildlife.

Public Health Analysis

The specified final reclamation variance request from Rule 1004 is minor and with COGCC approval will maintain protection of public health. The location is on private property and, according to the "Surface Owners" COGCC GIS mapping layer, does not require any consultations with the Colorado Department of Public Health and Environment (CDPHE) or Colorado's Division of Water Resources (DWR).

Public Safety Analysis

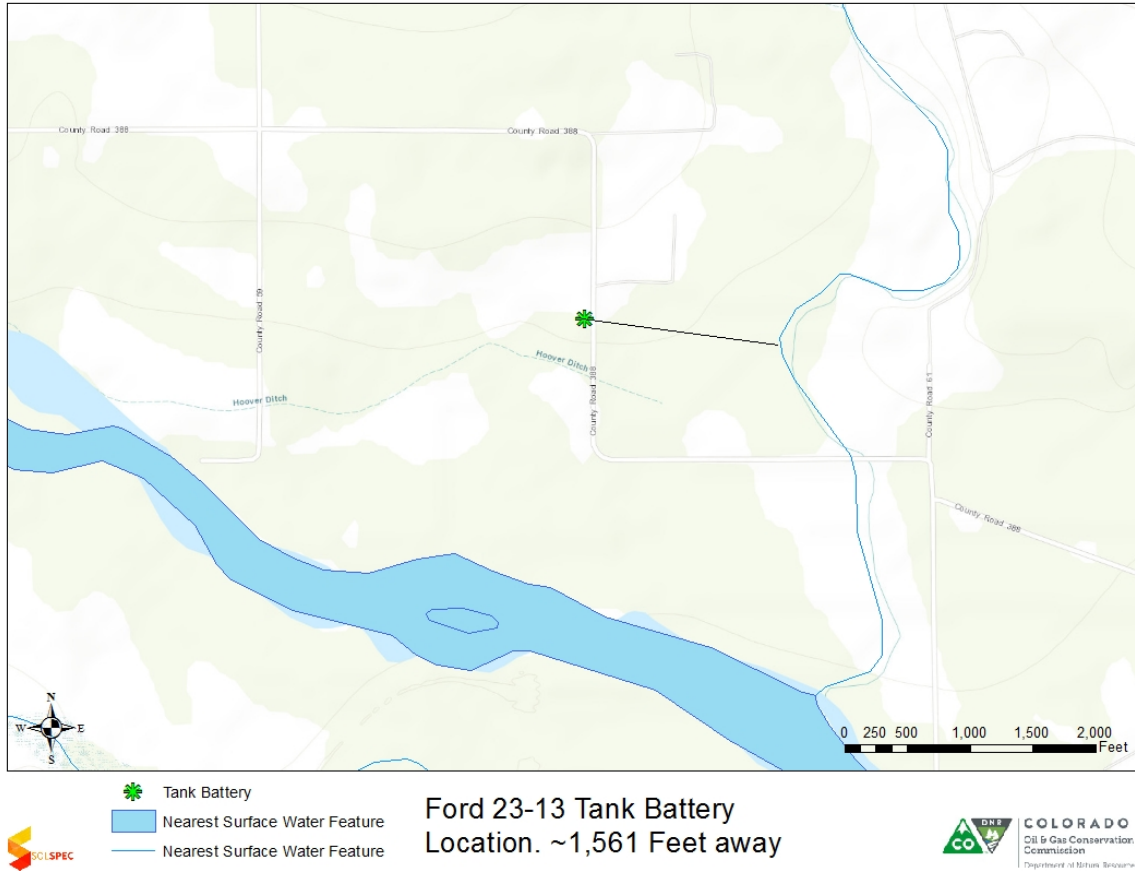
The specified final reclamation variance request from Rule 1004 is minor and will maintain protection of public safety. The location is a small parcel of land (0.16 acres) on private property. The Ford 23-13 former tank battery is located (40.395103, -104.498846) on the west side of Weld County Road 388 approximately 3.4 miles northeast of Kersey, Colorado. The location is surrounded by rural and agricultural land. The former Ford 23-13 wellhead, located at 40.397041, -104.500929, has been P&A and reclaimed (see Exhibits A and B).

Public Welfare Analysis

The specified final reclamation variances requested from Rule 1004 are minor requests that maintain the protection of public welfare. The location is on private property and will be returned to agricultural use by the surface owner. The location is zoned "Rural" by Weld County and the surface owner's desired use of the land is consistent with Weld County land use zoning standards.

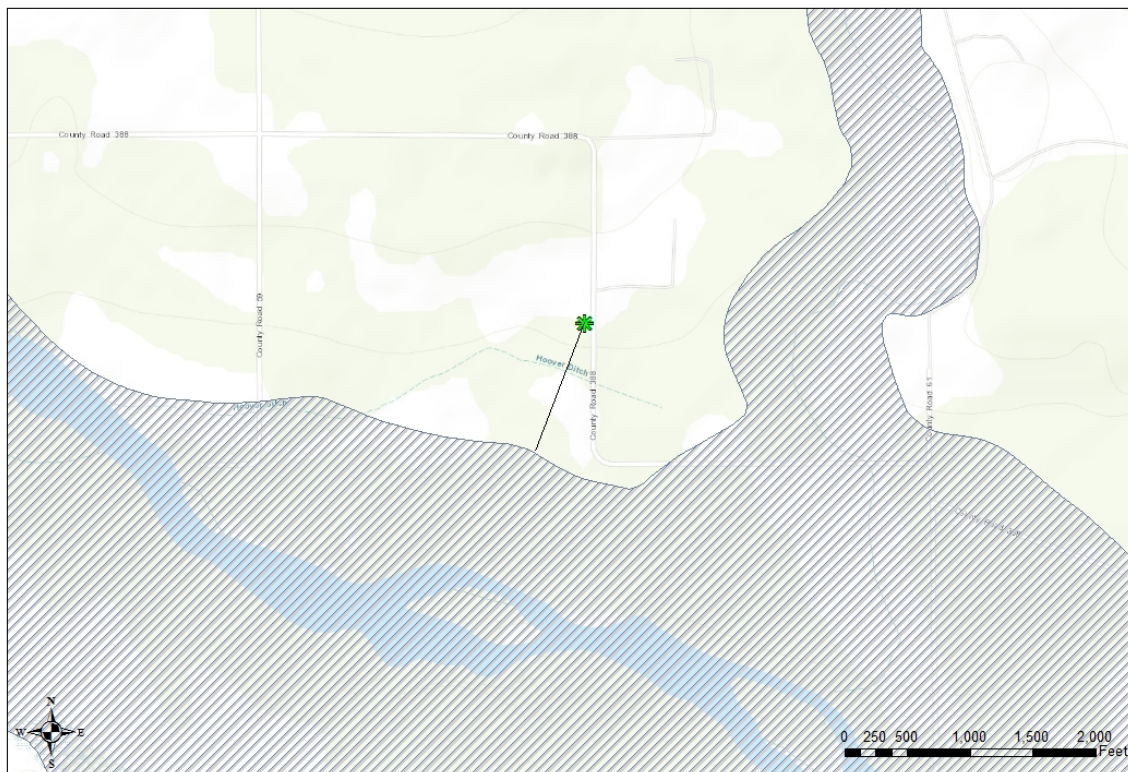
Environment




The Ford 23-13 former tank battery does not fall within a Rule 317B Public Water System Protection area, according to the COGCC GIS “PWS 317B” mapping layer. The Ford 23-13 former tank battery location is approximately 1,561 feet from the nearest surface water according to several COGCC GIS “Water Resources” mapping layers (Figure 1).




**Figure 1. Distance to nearest surface water feature for the Ford 23-13 former tank battery location.**

The Ford 23-13 former tank battery location does not fall within a defined FEMA, State, or Weld County 100-Year Floodplain, according to COGCC GIS “Floodplain” mapping layers and Weld County Floodplain data (Figure 2).



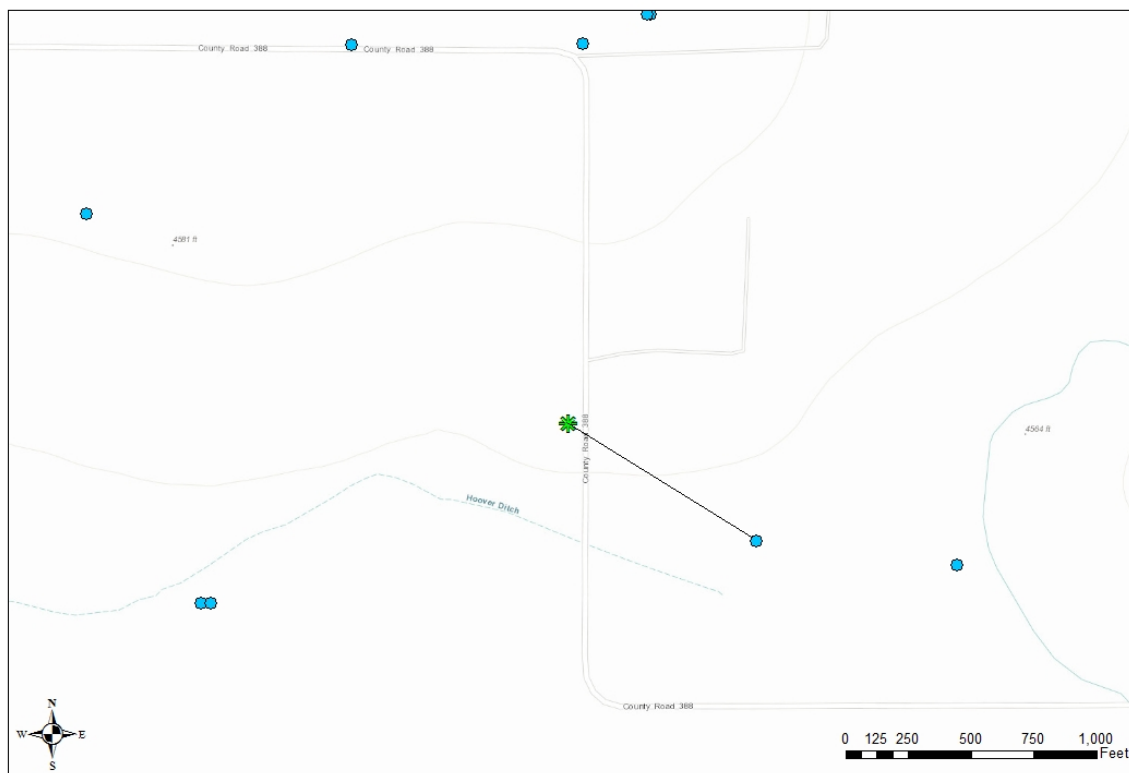
  Tank Battery  
 Nearest Identified Floodplain





**Ford 23-13 Tank Battery Location. ~1,095 Feet away**

 **COLORADO**  
Oil & Gas Conservation Commission  
Department of Natural Resources

**Figure 2. Distance to nearest 100-Year Floodplain for the Ford 23-13 former tank battery location.**

The Ford 23-13 former tank battery location is approximately 882 feet northwest of the nearest groundwater well, according to COGCC GIS “DWR\_Wells” mapping layer, which is based on Colorado’s DWR information (Figure 3).

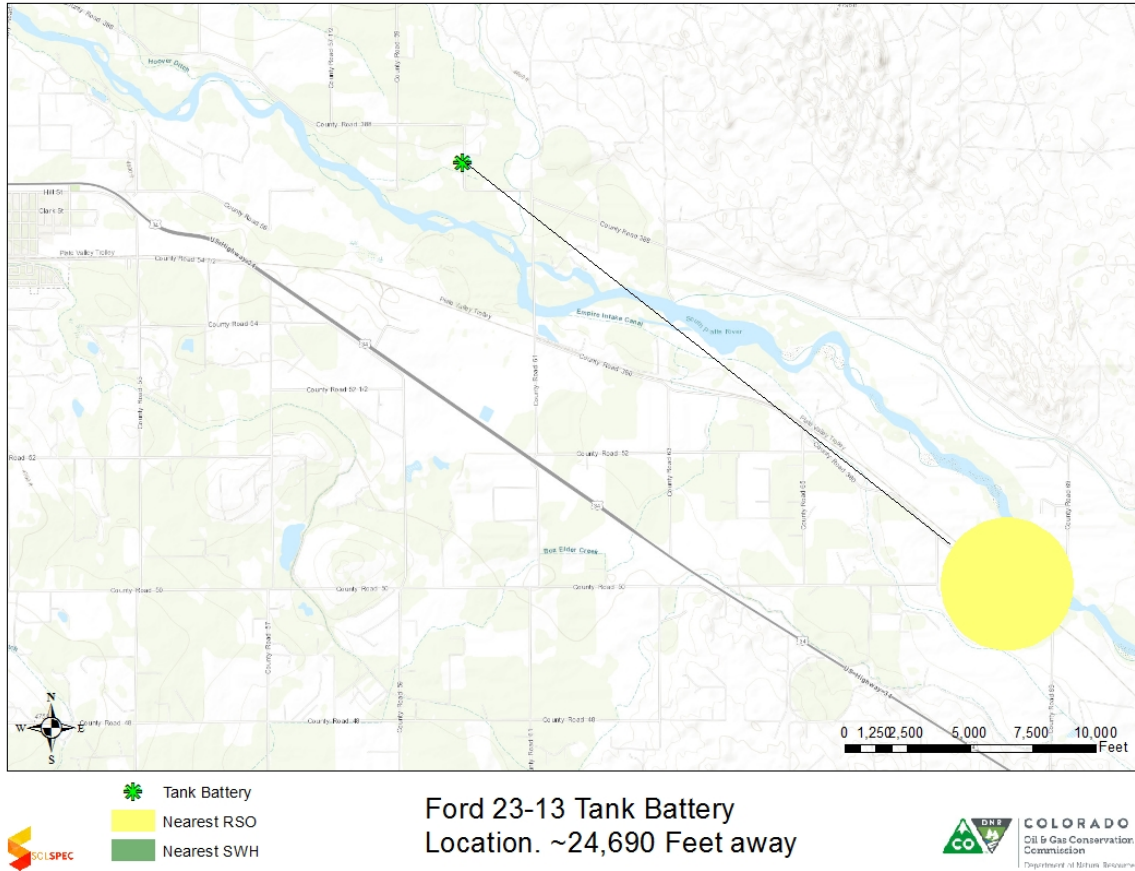


  Tank Battery  Nearest Ground Water Wells **Ford 23-13 Tank Battery Location. ~882 Feet away**  **COLORADO** Oil & Gas Conservation Commission Department of Natural Resources

**Figure 3. Distance to nearest groundwater well for the Ford 23-13 former tank battery location.**

## Wildlife

The Ford 23-13 former tank battery location is not within a defined “Restricted Surface Occupancy” (RSO) or “Sensitive Wildlife Habitat” (SWH) area as identified in the COGCC GIS “CPW\_RSO” and “CPW\_SWH” mapping layers (Figure 4). The nearest defined RSO area is 24,690 feet (4.7 miles) to the southeast.



**Figure 4. Distance to nearest Restricted Surface Occupancy (RSO) or Sensitive Wildlife Habitat (SWH) for the Ford 23-13 former tank battery location.**

**Based on this evaluation it has been established that:**

- given the small size of the location;
- the nature of the variance;
- the fact that the location is on private property;
- the fact that the location is not within a wetland or 100-Year Floodplain; and
- the fact that the location is not within a RSO or SWH area;

Granting this final reclamation variance for the Ford 23-13 former tank battery (Location ID: 332053) would have NO NEGATIVE IMPACTS on public health, public safety, public welfare, environment, or wildlife.

**Exhibit A:**  
**Facility Maps and Photos**



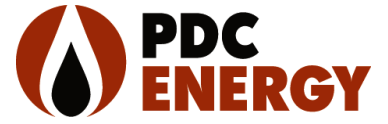
SoiSpec Imagery Date: 07/13/2018

<h2>Legend</h2> <ul style="list-style-type: none"><li> Well Location</li><li> Requested Variance</li></ul>	1:300		
		Date: 7/20/2018 Drone Pilot: Adam Dutko Projection: WGS 1984 UTM Zone 13N Produced by: SolSpec, LLC	
Total: 0.159 Acres*		*Estimated acres	

# Exhibit A: FACILITY PHOTOS

## PREPARED FOR: PDC ENERGY INC.

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Facility:

Facility Type:

Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

Date Prepared:

# Exhibit A: FACILITY PHOTOS

## PREPARED FOR: PDC ENERGY INC.

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Facility:

Facility Type:

Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

Date Prepared:

**Exhibit B:**

**Approved Well Abandonment – Subsequent Form 6**

Document Number:  
401360602

Date Received:  
08/01/2017

**WELL ABANDONMENT REPORT**

This form is to be submitted as an Intent to Abandon whenever an abandonment is planned on a borehole. After the abandonment is complete, this form shall again be submitted as a Subsequent Report of the actual work completed. The approved intent shall be valid for six months after the approval date, after that period, a new intent will be required. Attachments required with the Intent to Abandon are wellbore diagrams of the current configuration and the proposed configuration with plugs set.

A Subsequent Report of Abandonment shall indicate the actual work completed. Attachments required with a Subsequent Report are a wellbore diagram showing plugs that were set and casing remaining in the hole, the job summaries from all plugging contractors used, including wireline and cementing (third party verification) and any logs that may have been run during abandonment.

OGCC Operator Number: 69175 Contact Name: Jenifer Hakkarinen

Name of Operator: PDC ENERGY INC Phone: (303) 8605800

Address: 1775 SHERMAN STREET - STE 3000 Fax: \_\_\_\_\_

City: DENVER State: CO Zip: 80203 Email: Jenifer.Hakkarinen@pdce.com

**For "Intent" 24 hour notice required,** Name: Gomez, Jason Tel: (970) 573-1277

**COGCC contact:** Email: jason.gomez@state.co.us

API Number 05-123-21771-00

Well Name: FORD Well Number: 23-13

Location: QtrQtr: NESW Section: 13 Township: 5N Range: 64W Meridian: 6

County: WELD Federal, Indian or State Lease Number: \_\_\_\_\_

Field Name: WATTENBERG Field Number: 90750

Notice of Intent to Abandon       Subsequent Report of Abandonment

*Only Complete the Following Background Information for Intent to Abandon*

Latitude: 40.397045 Longitude: -104.500909

GPS Data:  
Date of Measurement: 06/03/2014 PDOP Reading: 2.1 GPS Instrument Operator's Name: Devin Arnold

Reason for Abandonment:  Dry  Production Sub-economic  Mechanical Problems  
 Other \_\_\_\_\_

Casing to be pulled:  Yes  No Estimated Depth: \_\_\_\_\_

Fish in Hole:  Yes  No If yes, explain details below

Wellbore has Uncemented Casing leaks:  Yes  No If yes, explain details below

Details: \_\_\_\_\_

**Current and Previously Abandoned Zones**

Formation	Perf. Top	Perf. Btm	Abandoned Date	Method of Isolation	Plug Depth
CODELL	6660	6674			
NIOBRARA	6376	6560			

Total: 2 zone(s)

**Casing History**

Casing Type	Size of Hole	Size of Casing	Weight Per Foot	Setting Depth	Sacks Cement	Cement Bot	Cement Top	Status
SURF	12+1/4	8+5/8	24	387	320	387	0	VISU
1ST	7+7/8	4+1/2	11.3	6,804	595	6,804	1,400	CBL

## Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 6326 with 2 sacks cmt on top. CIBP #2: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.  
CIBP #3: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top. CIBP #4: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.  
CIBP #5: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

Set 60 sks cmt from 600 ft. to 0 ft. Plug Type: CASING Plug Tagged:   
Set \_\_\_\_\_ sks cmt from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Type: \_\_\_\_\_ Plug Tagged:   
Set \_\_\_\_\_ sks cmt from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Type: \_\_\_\_\_ Plug Tagged:   
Set \_\_\_\_\_ sks cmt from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Type: \_\_\_\_\_ Plug Tagged:   
Set \_\_\_\_\_ sks cmt from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Type: \_\_\_\_\_ Plug Tagged:

Perforate and squeeze at \_\_\_\_\_ ft. with \_\_\_\_\_ sacks. Leave at least 100 ft. in casing \_\_\_\_\_ CICR Depth  
Perforate and squeeze at \_\_\_\_\_ ft. with \_\_\_\_\_ sacks. Leave at least 100 ft. in casing \_\_\_\_\_ CICR Depth  
Perforate and squeeze at \_\_\_\_\_ ft. with \_\_\_\_\_ sacks. Leave at least 100 ft. in casing \_\_\_\_\_ CICR Depth  
(Cast Iron Cement Retainer Depth)

Set \_\_\_\_\_ sacks half in. half out surface casing from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Tagged:

Set \_\_\_\_\_ sacks at surface

Cut four feet below ground level, weld on plate Above Ground Dry-Hole Marker:  Yes  No

Set \_\_\_\_\_ sacks in rat hole Set \_\_\_\_\_ sacks in mouse hole

### Additional Plugging Information for Subsequent Report Only

Casing Recovered: \_\_\_\_\_ ft. \_\_\_\_\_ inch casing Plugging Date: \_\_\_\_\_  
of \_\_\_\_\_

\*Wireline Contractor: \_\_\_\_\_ \*Cementing Contractor: \_\_\_\_\_

Type of Cement and Additives Used: \_\_\_\_\_

Flowline/Pipeline has been abandoned per Rule 1103  Yes  No \*ATTACH JOB SUMMARY

Technical Detail/Comments:

Ford 23-13 (05-123-21771)/Plugging Procedure (Intent)  
Producing Formation (Perforations): Niobrara: 6376'-6560' Codell: 6660'-6674'  
TD: 6804' PBD: 6770'  
Surface Casing: 8 5/8" 24# @ 387' w/ 320 sxs  
Production Casing: 4 1/2" 11.6# @ 6804' w/ 595 sxs cmt (TOC @ Surface' - CBL).

Tubing: 2 3/8" tubing set @ 6641' (10/2/2013).

Proposed Procedure:

1. MIRU pulling unit. Pull 2 3/8" tubing.
2. RU wireline company.
3. TIH with CIBP. Set BP at 6326'. Top with 2 sxs 15.8#/gal CI G cement.
4. TIH with tubing to 600'. RU cementing company. Mix and pump 60 sxs 15.8#/gal CI G cement down tubing. Cement should circulate to surface.
5. Cut surface casing 6' below ground level and weld on cap.

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

Signed: \_\_\_\_\_ Print Name: Jenifer Hakkarinen

Title: Reg Tech Date: 8/1/2017 Email: Jenifer.Hakkarinen@pdce.com

Based on the information provided herein, this Well Abandonment Report (Form 6) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: JENKINS, STEVE Date: 8/21/2017

<u>COA Type</u>	<u>Description</u>
	1) Provide 48 hour notice of plugging MIRU via electronic Form 42. 2) For the 600' plug: pump plug and displace. If surface casing plug is not circulated to surface then tag plug – must be at 337' or shallower and provide 10 sx plug at the surface. Leave at least 100' of cement in the casing for each plug. 3) Properly abandon flowlines as per Rule 1103. File electronic Form 42 once abandonment complete.
	1) Prior to starting plugging operations a Bradenhead test shall be performed. If the beginning pressure is greater than 25 psi, or if pressure remains at the conclusion of the test, or if any liquids were present contact COGCC Engineering for sampling requirements. The Form 17 shall be submitted within 10 days of the test.

**Attachment Check List**

<u>Att Doc Num</u>	<u>Name</u>
401360602	FORM 6 INTENT SUBMITTED
401360611	WELLBORE DIAGRAM
401360612	WELLBORE DIAGRAM
401360614	GYRO SURVEY

Total Attach: 4 Files

**General Comments**

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Public Room	Document verification complete 08/14/17	08/14/2017

Total: 1 comment(s)