

State of Colorado Oil and Gas Conservation Commission

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DE	ET	OE	ES
Document Number: 402016688			
Date Received: 04/29/2019			

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: <u>69175</u>	Contact Name <u>Phillip Porter</u>
Name of Operator: <u>PDC ENERGY INC</u>	Phone: <u>(303) 519-6847</u>
Address: <u>1775 SHERMAN STREET - STE 3000</u>	Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80203</u>	Email: <u>phillip.porter@pdce.com</u>

Complete the Attachment
Checklist

OP OGCC

API Number : <u>05-</u> <u>123</u> <u>00</u>	OGCC Facility ID Number: <u>452625</u>
Well/Facility Name: <u>Succo GU 4, 43-20 Battery</u>	Well/Facility Number: <u></u>
Location QtrQtr: <u>NWSE</u> Section: <u>20</u> Township: <u>2N</u> Range: <u>66W</u> Meridian: <u>6</u>	
County: <u>WELD</u> Field Name: <u>WATTENBERG</u>	
Federal, Indian or State Lease Number: <u></u>	

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 Sec

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	
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
Twp <u></u>	Range <u></u>	Meridian <u></u>	
Twp <u></u>	Range <u></u>	Meridian <u></u>	
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
Twp <u></u>	Range <u></u>		
Twp <u></u>	Range <u></u>		
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
Range <u></u>			
Range <u></u>			

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** attach deviated drilling plan

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 SUCCO GU 4, 43-20 BATTERY Number _____ 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 _____

☒ REPORT OF WORK DONE Date Work Completed 04/22/2019

- | | | |
|--|--|--|
| <input type="checkbox"/> Intent to Recomplete (Form 2 also required) | <input 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 checked="" 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:

Attn: Chris Binschus
Variance Request for the Succo Gas GU 4,43-20 tank battery/access road and the access road for Succo GU 3-20 access road that is being used by an other operator and a drive way fo rthe current home.

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:

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Best Management Practices**No BMP/COA Type****Description**

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Operator Comments:

Attn: Chris Binschus
 Variance Request for the Succo Gas GU 4,43-20 tank battery/access road and the access road for Succo GU 3-20 access road that is being used by an other operator and a drive way fo rthe current home.

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

Signed: _____ Print Name: Phillip Porter
 Title: Senior EHS Rep Email: phillip.porter@pdce.com Date: 4/29/2019

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

COGCC Approved:  Date: 6/27/2019

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

	All corrective actions identified on a field inspection report must be performed by the corrective action date until final reclamation is passed.
	Continue to monitor and manage the road, well pad, and tank battery for erosion and weed control until final reclamation is passed.
	PDC shall provide documentation that the tank battery is in compliance with Rule 1002.f.(2). PDC has not provided information demonstrating compliance with the previous corrective action Field Inspection Report (FIR) (Doc. #682403891). The FIR conducted on 8/21/2018 observed rill erosion along the fill slopes of the tank battery

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
	<p>Dear Director Robbins,</p> <p>On May 28th, 2019, you met with Denise Arthur, Reclamation Supervisor, and Margaret Ash, Field Inspection Unit Manager, regarding Final Reclamation Variance requests. Per the request of the Reclamation Supervisor, I am emailing you this Final Reclamation Variance Approval summary.</p> <p>Staff has conducted detailed assessments of the below Final Reclamation Variance requests per Rule 1001.c. and have found that the requests are sufficient and recommend approval. Staff finds that, in its current form, it is protective of public health, safety, welfare, the environment and wildlife resources with the below Conditions of Approval (COA). Below is a summary of four locations that PDC Energy Inc is requesting a final reclamation variance.</p> <p>4) Succo GU 4, 43-20 Batter, NWSE 20 2N66W, Location ID 452625, Form 4 Doc. #402016688</p> <p>Requested Variance:</p> <ul style="list-style-type: none"> - Requesting a variance of select requirements of rule 1004.a. to leave the western access road with cattle guard, a section of access road east of property owner's house that goes into former tank battery, and leave tank battery. Surface owner wants to leave the western access road to access a water well used for irrigation of the fields; the access road east of the house is used to access the pond on the property as well as the tank battery; the tank battery is going to be used for farm equipment storage. <p>COAs:</p> <ul style="list-style-type: none"> - Continue to monitor and manage the road, well pad, and tank battery for erosion and weed control until final reclamation is passed. - All corrective actions identified on a field inspection report must be performed by the corrective action date until final reclamation is passed. <p>Staff believes there is no further action required by the Director unless you would like some further action to occur on Staff's part. Please let us know if you would like Staff to set up additional communications.</p> <p>Best regards, Chris</p>	06/27/2019
Routing Review	Tasks have been opened for the Reclamation Group to review the operator's variance request.	04/30/2019
Reclamation Specialist	PDC states the following in the variance document "P&A for the Succo Gas Unit 4-20 wellhead was finalized on March 7, 2018." PDC appears to imply that the wellhead location meets our requirements; however, in the FIR conducted on 8/21/2018, it clearly demonstrates non-compliance with Rule 1004. COGCC staff wants to make it clear that the wellhead location does not meet Rule 1004 standards.	04/22/2019
Total: 3 comment(s)		

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402016688	SUNDRY NOTICE APPROVED-502b
402022045	VARIANCE REQUEST
402089745	FORM 4 SUBMITTED
Total Attach: 3 Files	