



PDC Energy, Inc.
4000 Burlington Ave.
Evans, CO 80620

Director Jeff Robbins
Colorado Oil and Gas Conservation Commission
1120 Lincoln St., Ste. #801
Denver, CO 80203

RE: COGCC Rule 1004 (Final Reclamation of Well Sites and Associated Production Facilities)
Well Name: Matt 1
API: 05-123-20011
Location ID: 331001
Location Name/No: MATT-64N67W /24NWSW
PLSS/Location: NWSW, Sec. 24, T4N R67W, 6 P.M., Weld County, Colorado

October 28, 2019

Dear Director Robbins,

PDC Energy, Inc. (PDC) has prepared a summary report documenting the progress in meeting the vegetative standard specified by Rule 1004.c for the former Matt 1 (331001) wellhead and production facility locations in response to COGCC Order No. 1V-678. This report contains reclamation inspection findings from a qualified third party consultant conducted between November 2018 to September 2019.

Reclamation monitoring will continue as specified in COGCC Order No. 1V-678 until the locations meet Rule 1004 requirements, at such point a Form 4 Sundry Notice will be submitted requesting an inspection to verify Final Reclamation Completion.

Several documents are attached to this letter, which are detailed below.

Attachment A: Summary Findings

A table summarizing inspection findings including vegetative characteristics and actions taken by PDC to ensure adequate reclamation progress.

Attachment B: Individual Inspection Reports

Individual inspection reports for the wellhead and production facility disturbances associated with the Matt 1 location from November 2018, May 2019, and August 2019.



The attached documents demonstrate that the Matt 1 location well pad and production facility locations are moving towards attaining the standards set forth by Rule 1004 and of PDC's compliance effort with the Administrative Order by Consent.

If you have any questions or would like additional information, please feel free to reach out to me.

Sincerely,

Phillip Porter, CHMM

Phillip Porter, CHMM
Senior Environmental Representative - Wattenberg
PDC Energy, Inc.

CC:

Jeremy Ferrin
Jason Thron
Brian Murray
Denise Arthur

Enclosure:

Attachment A: Summary Findings
Attachment B: Individual Inspection Reports

Attachment A:
Summary Findings

Inspection Date	Production Facility Observations	Wellhead Observations	PDC Corrective Actions
11/19/2018	<p>Production facility disturbance in process of re-vegetation. Good initial germination rate.</p> <p>Dirt pile labeled "landowner dirt" present just north of former battery. This pile was approved to be on location by the COGCC via email dated March 1, 2018.</p> <p>Vegetation percentages (of background): ~19%</p>	<p>Wellhead location re-vegetation nearly match background.</p> <p>One inch poly-pipe was observed in the ground</p> <p>Vegetation percentages (of background) 80%</p>	<p>No corrective actions performed.</p> <p>Poly-Pipe was removed.</p>
5/28/2019	<p>Disturbance's vegetative cover increased substantially;. Several Class C noxious weeds observed.</p> <p>Vegetation percentages (of background): ~60-80%</p>	<p>The ground cover matches background. Some Canada/Musk thistle at edge of disturbance.</p> <p>Vegetation percentages (of background) ~80%</p>	<p>PDC performed weed control on June 13, 2019 on the well pad and production facility.</p>
8/21/2019	<p>Vegetation cover similar as May 2019 inspection.</p> <p>List B & C noxious weeds were observed</p> <p>Vegetation percentages (of background): 60-80%</p>	<p>The ground cover matches background.</p> <p>List C noxious weeds were observed</p> <p>Vegetation percentages (of background): ~80%</p>	<p>PDC will conduct pre-emergent weed control prior to next growing season.</p>

Attachment B:
Individual Inspection Reports



Location Name: Matt 1 (production facility)

Reclamation Inspection Report

Inspection Date:	Nov 19, 2018	Inspector:	P. Arendt
Facility Accessed Via:	Truck/ATV		
Survey Method(s):	Ocular, Handheld Camera		

Oil and Gas Well/Pad	
Does any Oil and Gas equipment remain on location?	No
If No, describe remaining equipment:	
Are there noxious/listed weeds present?	No
Are the noxious/listed weeds originating from the surrounding land or from the reclamation?	
Describe Weeds and Extent:	
Does the well/production facility pad remain and need dirt work to reclaim?	No
If Yes, describe pad features that remain on location:	
Are there any signs of settling on location?	No
If Yes, describe settling:	
Is there any evidence of SWMP erosion, sediment movement or future potential for SWMP concerns?	No
If Yes, describe erosion and/or sediment issues/concerns:	
What are the landuse(s) of the location?	Pasture/Grazing
If the land use includes cropland, has the former pad/well location been reestablished by the landowner as cropland?	
Do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?	
Describe Impaired Crops:	
Has the pad/well location been seeded and is the vegetation cover uniform?	Yes
% of uniform vegetative cover over entire pad/well site (ocular evaluation):	0 to 19
When was this inspection conducted (season)?	
Should this location be seeded/reseeded?	No
As the inspector, you are confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over entire location, equipment left on location, weeds, etc.)?	
Does a SamplePoint or Line Point analysis need run to confirm final reclamation status on the well/pad location?	
Describe what is needed to get location to final reclamation: Based on the site's unreclaimed status at the most recent COGCC inspection (~2/2018), subsequent reclamation has experienced one growing season. Suggest re-examining site during 2019 growing season.	
Additional well/pad comments: Straw mulch still present on ground. Site reclaimed and recontoured, including intermittent drainage at SE corner. Fill dirt pile with stake labeled "landowner dirt" present just north of former location; pile approved by the COGCC on March 1, 2018 by Chris Binchus.	

Site Name: Matt 1 (production facility)
Overview photo



Site Name: Matt 1 (production facility)

Reclaimed disturbance vegetation cover (upper) vs. background/reference area vegetation cover (lower)



Site Name Well 1 (production facility)
Finddown dirt pile leftover from facility demolition; pile approved by the COGCC on March 1, 2018 via email by Chris Binchus.





Location Name: Matt 1 (wellhead)

Reclamation Inspection Report

Inspection Date:	Nov 19, 2018	Inspector:	P. Arendt
Facility Accessed Via:	Foot		
Survey Method(s):	Ocular, Handheld Camera		

Oil and Gas Well/Pad	
Does any Oil and Gas equipment remain on location?	Yes
If No, describe remaining equipment: Partially buried poly pipe observed directly southwest of well location at November 19, 2018 inspection. Poly pipe was removed immediately after this observation.	
Are there noxious/listed weeds present?	No
Are the noxious/listed weeds originating from the surrounding land or from the reclamation?	
Describe Weeds and Extent:	
Does the well/production facility pad remain and need dirt work to reclaim?	No
If Yes, describe pad features that remain on location:	
Are there any signs of settling on location?	No
If Yes, describe settling:	
Is there any evidence of SWMP erosion, sediment movement or future potential for SWMP concerns?	No
If Yes, describe erosion and/or sediment issues/concerns:	
What are the land use(s) of the location?	Pasture/Grazing
If the land use includes cropland, has the former pad/well location been reestablished by the landowner as cropland?	
Do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?	
Describe Impaired Crops:	
Has the pad/well location been seeded and is the vegetation cover uniform?	Yes
% of uniform vegetative cover over entire pad/well site (ocular evaluation):	80 +
When was this inspection conducted (season)?	
Should this location be seeded/reseeded?	
As the inspector, you are confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over entire location, equipment left on location, weeds, etc.)?	No
Does a SamplePoint or Line Point analysis need run to confirm final reclamation status on the well/pad location?	
Describe what is needed to get location to final reclamation:	
Additional well/pad comments: Vegetation appears to meet final reclamation requirements.	

Site Name: Matt 1 (wellhead)

Partially buried poly pipe observed directly southwest of well location at November 19, 2018 inspection. Poly pipe was removed immediately after this observation.



Site Name: Matt 1 (wellhead)
Overview photo





Final Reclamation Inspection Report

Facility/Location:	Matt 1 (production facility)		
Inspection Date:	May 28, 2019	Survey Type:	Final PA
Inspector:	P. Arendt	Inspection Time:	09:30
Survey Method:	Ocular, Handheld Camera	Company:	H2E
SamplePoint Pic's Collected:	No	Access Method:	Truck/ATV
Season Conducted:	Growing Season		

Pad Reclamation Information		(Yes/No)
What is the land use of the location?	Pasture/Grazing	
* If includes cropland, has the former pad/well location been reestablished by the landowner as cropland?		
* If includes cropland, do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?		
* If crops are impaired, describe:		
Has the location been seeded and is the vegetation cover uniform?	Yes	
Is seeding/reseeding recommended for this location?	No	
Are there noxious or listed weeds present?	Yes	
* If weeds are present, where are they originating from?	Surrounding Landscape	
* If weeds present, describe:	Minor amounts of cheatgrass	
Does any oil and gas equipment remain on location?	No	
* If equipment remains, describe:		
Does the well/production facility pad remain and need dirt work to reclaim?	No	
* If dirt work is required, describe:		
Are there any signs of settling on location?	No	
* If signs of settling, describe:		
Is there any evidence of stormwater erosion, sediment movement, or future potential for stormwater related concerns?	No	
* If erosion/sediment concerns, describe:		

Pad Final Assessment	
Ocular Estimate of desirable species density relative to adjacent native/undisturbed vegetation?	80 +
As the inspector, are you confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over the entire location, equipment left on location, weeds, etc.)?	No
* If no, describe what is needed to get the location to final reclamation:	
Does a SamplePoint or line point analysis need processed to confirm final reclamation status on the well/pad location?	No
Pad Reclamation Notes:	Desirable species present in the reclaimed area include crested wheatgrass and snow-on-the-mountain. Some patchy areas are present the site's northern and southern ends, which would presumably benefit from additional growing season time.

Access Road Reclamation Information*		(Yes/No)
Was there an access road associated with this location?		No
What is the land use of the location?		
* If includes cropland, has the former pad/well location been reestablished by the landowner as cropland?		
* If includes cropland, do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?		
* If crops are impaired, describe:		
Has the location been seeded and is the vegetation cover uniform?		NA
Is seeding/reseeding recommended for this location?		
Are there noxious or listed weeds present?		Cheat grass
* If weeds are present, where are they originating from?		
* If weeds present, describe:		
Does any oil and gas equipment remain on location?		No
* If equipment remains, describe:		
Does the well/production facility pad remain and need dirt work to reclaim?		
* If dirt work is required, describe:		
Is there any evidence of stormwater erosion, sediment movement, or future potential for stormwater related concerns?		No
* If erosion/sediment concerns, describe:		

Access Road Final Assessment*		
Ocular Estimate of desirable species density relative to adjacent native/undisturbed vegetation?		NA
As the inspector, are you confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over the entire location, equipment left on location, weeds, etc.)?		No
* If no, describe what is needed to get the location to final reclamation:	Additional time, weed management	
Does a SamplePoint or line point analysis need processed to confirm final reclamation status on the well/pad location?		NA
Access Road Reclamation Notes:		

Reclamation Survey General Notes:
Canopy cover percentages are expressed as rough ocular estimates. More official values will be collected when Form 4 submission for final reclamation completion is done.

Site Name: Matt 1 (production facility)
Overview photo looking north



Site Name: Matt 1 (production facility)
Overview photo looking east



Site Name: Matt 1 (production facility)

Ground photo of canopy cover in reclaimed area. Overall, seeded perennial grasses have taken well with little annual grass/forb content present.



Site Name: Matt 1 (production facility)

Reference photo of background vegetation, a mixture of annual/perennial grasses and forbs with high cheatgrass content



Site Name: Matt 1 (production facility)
Patchy vegetation (with more bare ground) at site's southern end





Final Reclamation Inspection Report

Facility/Location:	Matt 1 (wellhead)		
Inspection Date:	May 28, 2019	Survey Type:	Final PA
Inspector:	P. Arendt	Inspection Time:	09:45
Survey Method:	Ocular, Handheld Camera	Company:	H2E
SamplePoint Pic's Collected:	No	Access Method:	Truck/ATV
Season Conducted:	Growing Season		

Pad Reclamation Information		(Yes/No)
What is the land use of the location?	Pasture/Grazing	
* If includes cropland, has the former pad/well location been reestablished by the landowner as cropland?		
* If includes cropland, do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?		
* If crops are impaired, describe:		
Has the location been seeded and is the vegetation cover uniform?	Yes	
Is seeding/reseeding recommended for this location?	No	
Are there noxious or listed weeds present?	Yes	
* If weeds are present, where are they originating from?	Surrounding Landscape	
* If weeds present, describe:	Cheatgrass throughout and Canada thistle sprouting near (or on) SE edge of former disturbance	
Does any oil and gas equipment remain on location?	No	
* If equipment remains, describe:		
Does the well/production facility pad remain and need dirt work to reclaim?	No	
* If dirt work is required, describe:		
Are there any signs of settling on location?	No	
* If signs of settling, describe:		
Is there any evidence of stormwater erosion, sediment movement, or future potential for stormwater related concerns?	No	
* If erosion/sediment concerns, describe:		

Pad Final Assessment	
Ocular Estimate of desirable species density relative to adjacent native/undisturbed vegetation?	80 +
As the inspector, are you confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over the entire location, equipment left on location, weeds, etc.)?	No
* If no, describe what is needed to get the location to final reclamation:	
Does a SamplePoint or line point analysis need processed to confirm final reclamation status on the well/pad location?	No
Pad Reclamation Notes:	Desirable species present in the reclaimed area include crested wheatgrass, western wheatgrass, and smooth brome. Canopy cover of assumed original disturbance matches the immediate background the south, however, noxious weeds such as cheatgrass (list C) and Canada thistle are present on or near disturbance area.

Access Road Reclamation Information*		(Yes/No)
Was there an access road associated with this location?		No
What is the land use of the location?		
* If includes cropland, has the former pad/well location been reestablished by the landowner as cropland?		
* If includes cropland, do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?		
* If crops are impaired, describe:		
Has the location been seeded and is the vegetation cover uniform?		
Is seeding/reseeding recommended for this location?		
Are there noxious or listed weeds present?		NA
* If weeds are present, where are they originating from?		
* If weeds present, describe:		
Does any oil and gas equipment remain on location?		
* If equipment remains, describe:		
Does the well/production facility pad remain and need dirt work to reclaim?		
* If dirt work is required, describe:		
Is there any evidence of stormwater erosion, sediment movement, or future potential for stormwater related concerns?		
* If erosion/sediment concerns, describe:		

Access Road Final Assessment*	
Ocular Estimate of desirable species density relative to adjacent native/undisturbed vegetation?	
As the inspector, are you confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over the entire location, equipment left on location, weeds, etc.)?	
* If no, describe what is needed to get the location to final reclamation:	
Does a SamplePoint or line point analysis need processed to confirm final reclamation status on the well/pad location?	
Access Road Reclamation Notes:	

Reclamation Survey General Notes:
 Canopy cover percentages are expressed as rough ocular estimates. More official values will be collected when Form 4 submission for final reclamation completion is done.

Site Name: Matt 1 (wellhead)

Overview photo looking east. Though the wellhead location hasn't received traditional reclamation techniques (e.g., seeding/mulching) in recent memory, this area is nearly indistinguishable from the background due to repeated disturbance such as grazing, mowing, etc., as shown by historical Google Earth imagery.



Site Name: Matt 1 (wellhead)

Noxious weeds - Canada thistle (list B) and cheatgrass (list C)





Location Name: Matt 1 (production facility)

Reclamation Inspection Report			
Inspection Date:	Aug 21, 2019	Inspector:	P. Arendt
Facility Accessed Via:	Truck/ATV		
Survey Method(s):	Occular , Handheld Camera		

Oil and Gas Well/Pad	
Does any Oil and Gas equipment remain on location?	No
If No, describe remaining equipment:	
Are there noxious/listed weeds present?	Yes
Are the noxious/listed weeds originating from the surrounding land or from the reclamation?	Surrounding Landscape
Describe Weeds and Extent: Cheatgrass, Field bindweed, Puncturevine (all Class C)	
Does the well/production facility pad remain and need dirt work to reclaim?	No
If Yes, describe pad features that remain on location:	
Are there any signs of settling on location?	No
If Yes, describe settling:	
Is there any evidence of SWMP erosion, sediment movement or future potential for SWMP concerns?	No
If Yes, describe erosion and/or sediment issues/concerns:	
What are the landuse(s) of the location?	Pasture/Grazing
If the land use includes cropland, has the former pad/well location been reestablished by the landowner as cropland?	
Do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?	
Describe Impaired Crops:	
Has the pad/well location been seeded and is the vegetation cover uniform?	Yes
% of uniform vegetative cover over entire pad/well site (ocular evaluation):	60 to 79
When was this inspection conducted (season)?	Growing Season
Should this location be seeded/reseeded?	
As the inspector, you are confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over entire location, equipment left on location, weeds, etc.)?	
Does a SamplePoint or Line Point analysis need run to confirm final reclamation status on the well/pad location?	No
Describe what is needed to get location to final reclamation: More time for sufficient vegetation.	
Additional well/pad comments: Species findings the same as at the May 2019 inspection. Some bare areas with patchy vegetation are present at the site's northern and southern ends.	

Site Name: Matt 1 (production facility)
Overview photo looking north



Site Name: Matt 1 (production facility)
Reference/native vegetation



Site Name: Matt 1 (production facility)
Reclamation vegetation





Location Name: Matt 1 (wellhead)

Reclamation Inspection Report			
Inspection Date:	Aug 21, 2019	Inspector:	P. Arendt
Facility Accessed Via:	Truck/ATV		
Survey Method(s):	Occular , Handheld Camera		

Oil and Gas Well/Pad	
Does any Oil and Gas equipment remain on location?	No
If No, describe remaining equipment:	
Are there noxious/listed weeds present?	Yes
Are the noxious/listed weeds originating from the surrounding land or from the reclamation?	Surrounding Landscape
Describe Weeds and Extent: Musk thistle (class B, prevents attaining final reclamation completion status), Cheatgrass & Field bindweed (both class C)	
Does the well/production facility pad remain and need dirt work to reclaim?	No
If Yes, describe pad features that remain on location:	
Are there any signs of settling on location?	No
If Yes, describe settling:	
Is there any evidence of SWMP erosion, sediment movement or future potential for SWMP concerns?	No
If Yes, describe erosion and/or sediment issues/concerns:	
What are the landuse(s) of the location?	Pasture/Grazing
If the land use includes cropland, has the former pad/well location been reestablished by the landowner as cropland?	
Do the crops on the reclaimed areas appear less healthy (impaired) as compared to the crops on the non-disturbed areas?	
Describe Impaired Crops:	
Has the pad/well location been seeded and is the vegetation cover uniform?	Yes
% of uniform vegetative cover over entire pad/well site (ocular evaluation):	80 +
When was this inspection conducted (season)?	
Should this location be seeded/reseeded?	
As the inspector, you are confident this pad/well site will meet all of the release criteria (including at least 80% plant cover over entire location, equipment left on location, weeds, etc.)?	No
Does a SamplePoint or Line Point analysis need run to confirm final reclamation status on the well/pad location?	No
Describe what is needed to get location to final reclamation: Removal of Class B noxious weed - musk thistle.	
Additional well/pad comments: Species findings the same as at the May 2019 inspection.	

Site Name: Matt 1 (wellhead)
Overview photo looking east



Site Name: Matt 1 (wellhead)
Musk thistle – Class B noxious weed

