



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

Well Name: Wolf 13-32

Location ID: 327273

API #: 05-123-14422

Prepared for:
PDC Energy Inc.

Prepared by:
Duraroot, LLC

Date:
August 2020



August 31, 2020

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: Wolf 13-32 Location ID: 327273 API #: 05-123-14422
Section 32: NWSW, Township 4 North, Range 66 West, 6th P.M.
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 former Wolf 13-32 (API #: 05-123-14422) production facility. PDC has plugged and abandoned (P&A) the former Wolf 13-32 well in accordance with the requirements of Rule 1004.a. (Form 6 Subsequent Document Number: 400741985). Furthermore, in accordance with the surface owner's request (see Attachment A), PDC has left the production facility. The surface owner(s), Mr. Joe Willkins III, have requested that PDC not remove/ reclaim the former Wolf 13-32 production facility. The surface owner(s) have expanded the former facility area and would like to maintain the production facility area to store extra material for their sod farm

Due to the surface owner's final reclamation request of the location, we are requesting your approval for a variance from the requirements of 1004.a, 1004.c.(2), 1004.d, and Rule 1004.e pursuant to Rule 1001.c. The documents attached to this letter for the former Wolf 13-32 location were developed in accordance with the December 17, 2019, version of the Colorado Oil and Gas Conservation Commission's (COGCC's) Rule 1001.c: Surface Owner Waiver for Final Reclamation guidance document (Operator Guidance Document).

Attachment A: Executed Final Reclamation Agreement

Attachment A is a signed and executed agreement that PDC has entered with the surface owner(s) (Mr. Joe Willkins III) regarding the location's final reclamation efforts and the request to leave the former production facility in place. Attachment A, along with Exhibit A, fulfills the four (4) requirements listed in Sections 3.1, 3.3, 3.4, and 3.8 of the Guidance Document.

Attachment B: Operator Demonstration

Attachment B, along with all figures and Exhibits A and B, fulfills the requirements of Sections 3.5 and 3.6 of 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, 2019, version of the COGCC Rule 1001.c: Surface Owner Waiver for Final Reclamation 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,

Phillip Porter, CAEMM

Phillip Porter
Senior Environmental Representative – Wattenberg
PDC Energy, Inc.

Attachments:

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

Attachment A:
Executed Final Reclamation Agreement

To Whom It May Concern at the COGCC;

I, Joe Willkins III, owner of parcel 105732000040 Sec 32, T4N, R66W, in Weld County, Colorado, have requested PDC Energy not reclaim the production facility for the now Plugged and Abandoned Wolfe 13-32 well. We use this area to store material for our sod business.

Thank you,

A handwritten signature in black ink, appearing to read "Joe Willkins III", with a stylized flourish at the end.

Joe Willkins III, Owner of Platteville Vista, LLC
6194 S Benton Ct
Littleton, CO 80123



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

July 30, 2020

Platteville Vista LLC
6194 S Benton Ct
Littleton, CO 80123

Re: **Final Reclamation Agreement**
Wolfe 13-32 (API 05-123-14422) Production Facility
Township 4 North, Range 66 West, 6th P.M.
Section 32: NWSW
Weld County, Colorado

Dear Platteville Vista LLC (the "Surface Owner(s)"):

PDC Energy, Inc. ("PDC") has previously consulted with the Surface Owner(s) concerning the final reclamation of the above-captioned well(s) and/or facility discussing the future land use and applicability of the rules of the Colorado Oil and Gas Conservation Commission ("COGCC") as they pertain to your lands. The well(s) were plugged and abandoned and PDC has removed all associated production facility equipment from the site(s). PDC and the Surface Owner completed a surface owner consultation in accordance with COGCC Rule 306.f on May 22, 2020. Based on this consultation PDC and the Surface Owner, agree to enter into this Final Reclamation Agreement in accordance with COGCC Rule 1001.c, 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 production facility location

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:

- Landowners have expanded the former production facility area to store extra material for their sod farm, so this area will remain unfarmed.

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) 342-0135.

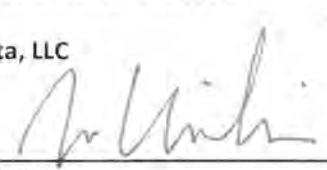
Respectfully,



Brian DeRose
Surface Land Supervisor

I acknowledge and agree as set forth above.

Platteville Vista, LLC

Signed: 

BY: Joe Willkins III

Title: Owner

Date: 07/30/2020

ACKNOWLEDGEMENTS

State of Colorado)
) §
County of Douglas)

On this 30 day of July, 20 20, before me personally appeared Joe Willkins III, Owner of Platteville Vista, LLC, 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)

Guadalupe Attagracia Stone NOTARY PUBLIC STATE OF COLORADO NOTARY ID 20114071005 MY COMMISSION EXPIRES November 18, 2023
--

My commission expires: November 18, 2023


Notary Public

Exhibit A

Platteville Vista LLC
6194 S Benton Ct
Littleton, CO 80123

Re: **Final Reclamation Agreement**
Wolfe 13-32 (API 05-123-14422) Production Facility
Township 4 North, Range 66 West, 6th P.M.
Section 32: NWSW
Weld County, Colorado



Attachment B:
Operator Demonstration

Attachment B



August 31, 2020

RE: Operator Demonstration for:
Well Name: Wolf 13-32 Location ID: 327273 API #: 05-123-14422
Section 32: NWSW, Township 4 North, Range 66 West, 6th P.M.
Weld County, Colorado

The information below addresses the requirements detailed in Sections 3.5 and 3.6 of the Colorado Oil and Gas Conservation Commission's (COGCCs) Rule 1001.c: Surface Owner Waiver for Final Reclamation guidance document (Operator Guidance Document) dated December 17, 2019. Sections 3.5 and 3.6 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.

- 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 Wolf 13-32 (API #: 05-123-14422) well has been P&A as per the COGCC Rules and the Form 6 Subsequent has been submitted (Exhibit B: Document Number 400741985).

- 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. Exhibit A consists of facility photos taken on August 14, 2020, that demonstrate all equipment has been removed.

- 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 facility photos taken on August 14, 2020, that demonstrate all trash and debris has been removed.

- 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

facility photos taken on August 14, 2020, that demonstrate noxious weed control on the location.

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(s) (Mr. Joe Willkins III) on July 30, 2020, for the former Wolf 13-32 production facility location documenting good faith consultation with the surface owner(s).

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(s) requested that PDC not remove/ reclaim the former Wolf 13-32 production facility location. The disturbance area for the former Wolf 13-32 production facility is approximately 0.21 acre. The surface owner(s) have expanded the former facility area and would like to maintain the production facility area to store extra material for their sod farm.

P&A for the Wolf 13-32 well was finalized on October 30, 2014. All associated wellhead equipment has been removed. Exhibit A consists of facility photos taken on August 14, 2020, that demonstrate the existing state of reclamation on the former Wolf 13-32 location.

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

The former Wolf 13-32 well has been P&A and reclaimed in accordance with Rule 1004. The former Wolf 13-32 production facility is located at the intersection of CO-60 and County Road 38.5 approximately 3.7 miles north of Platteville, Colorado. The production facility location surface is compacted for stabilization.

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 facility photos taken on August 14, 2020, that demonstrate current site conditions, including adequate site stabilization and stormwater management.

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 former Wolf 13-32 location 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 surrounded by agricultural land. The former Wolf 13-32 production facility is located at the intersection of CO-60 and County Road 38.5 approximately 3.7 miles north of Platteville, Colorado. The former Wolf 13-32 wellhead (40.267207, -104.808118) has been P&A and reclaimed in accordance with Rule 1004 (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 used by the surface owner for extra material storage for their adjacent sod farm. The location is zoned “Agricultural” by Weld County and the surface owner’s desired use of the land is compatible with Weld County land use zoning standards.

Environment

The former Wolf 13-32 location does not fall within a Rule 317B Public Water System Protection area, according to the COGCC GIS “PWS 317B” mapping layer. The former Wolf 13-32 location is approximately 2,263 feet from the nearest surface water (Farmers Independent Ditch) according to several COGCC GIS “Water Resources” mapping layers (Figure 1). Due to the nature of this variance the Wolf 13-32 location does not pose a risk to surface water.



Figure 1. Distance to nearest surface water feature for the former Wolf 13-32 location.

The former Wolf 13-32 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).



Figure 2. Distance to nearest 100-Year Floodplain for the former Wolf 13-32 location.

The former Wolf 13-32 location is approximately 532 feet north of the nearest groundwater well, according to COGCC GIS “DWR_Wells” mapping layer, which is based on Colorado’s DWR information (Figure 3).

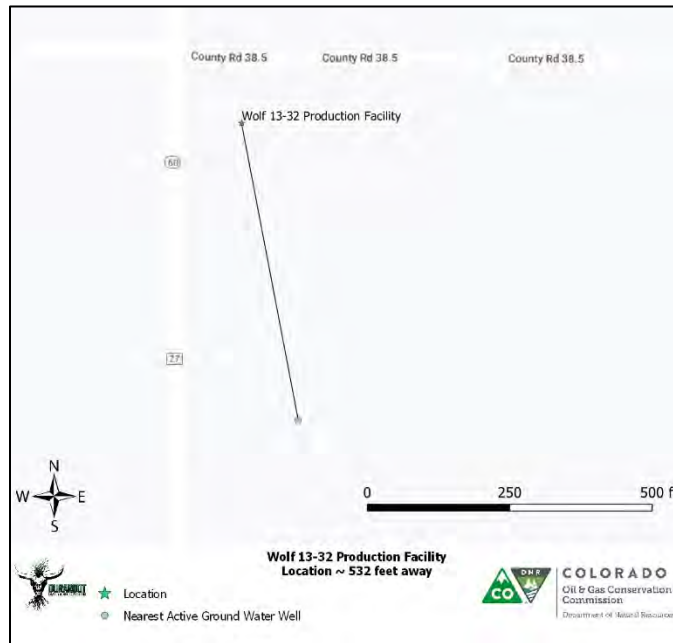


Figure 3. Distance to nearest groundwater well for the former Wolf 13-32 location.

Wildlife

The former Wolf 13-32 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 SWH area is 2.3 miles to the west.

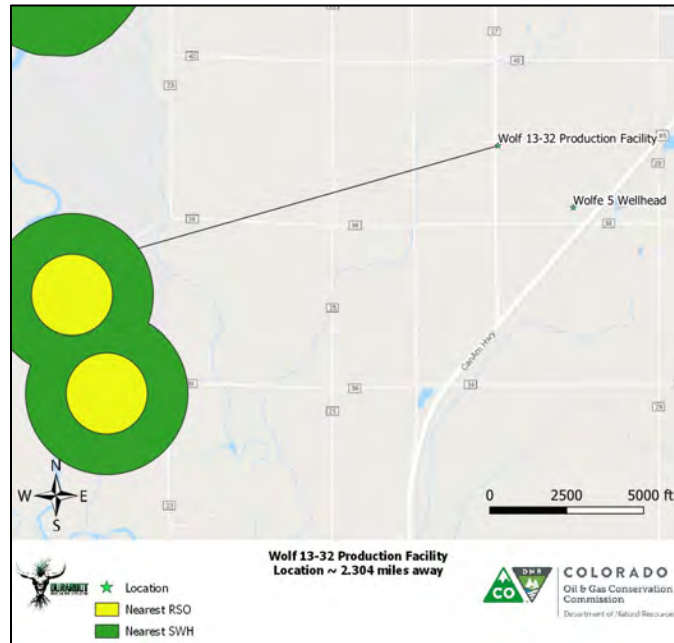


Figure 4. Distance to nearest Restricted Surface Occupancy (RSO) or Sensitive Wildlife Habitat (SWH) for the former Wolf 13-32 location.

Based on this evaluation it has been established that:

- given the small size of the variance request (0.21 acre);
- the nature of the variance request;
- the surface owner’s plans for the location; and
- the fact that the location is on private property;

Granting this final reclamation variance for the former Wolf 13-32 location would have NO NEGATIVE IMPACTS on public health, public safety, public welfare, environment, or wildlife.

Exhibit A:
Facility Photos and Aerial Imagery

Exhibit A: FACILITY PHOTOS

PREPARED FOR: PDC ENERGY, INC.



Facility:

Facility Type:

Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

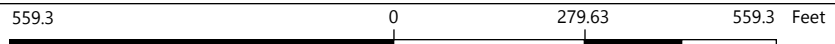
Date Prepared:



Legend

- API Label
- Well Name Label
- ▲ Weld Oil and Gas Location As
- Oil and Gas Wells - Active
 - Producing
 - Permit
 - Drilling
 - Injection
 - Shut-In
 - Temporarily Abandoned
 - Waiting on Completion
 - Gas Storage / Monitoring
- Oil and Gas Wells - Inactive
 - Abandoned Location
 - Plugged and Abandoned
 - Dry and Abandoned
 - Other
- Highway
- Township / Range
- Section
- Quarter Section
- County Boundary

Notes





Legend

- API Label
- Well Name Label
- ▲ Weld Oil and Gas Location Ass
- Oil and Gas Wells - Active
 - Producing
 - Permit
 - Drilling
 - Injection
 - Shut-In
 - Temporarily Abandoned
 - Waiting on Completion
 - Gas Storage / Monitoring
- Oil and Gas Wells - Inactive
 - Abandoned Location
 - Plugged and Abandoned
 - Dry and Abandoned
 - Other
- Highway
- Township / Range
- Section
- Quarter Section
- County Boundary

1: 419



69.9 0 34.95 69.9 Feet

Notes

Exhibit B:

Well Abandonment – Subsequent Form 6

Document Number:
400741985

Date Received:
03/10/2015

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: Christine Brookshire

Name of Operator: PDC ENERGY INC Phone: (303) 860-5800

Address: 1775 SHERMAN STREET - STE 3000 Fax: (303) 860-5838

City: DENVER State: CO Zip: 80203 Email: christine.brookshire@pdce.com

For "Intent" 24 hour notice required, Name: _____ Tel: _____

COGCC contact: Email: _____

API Number 05-123-14422-00

Well Name: WOLFE Well Number: 13-32

Location: QtrQtr: NWSW Section: 32 Township: 4N Range: 66W Meridian: 6

County: WELD Federal, Indian or State Lease Number: 67462

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: 40.266992 Longitude: -104.808105

GPS Data:
Date of Measurement: 02/10/2010 PDOP Reading: 2.5 GPS Instrument Operator's Name: Brandon Lucason

Reason for Abandonment: Dry Production for 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	7291	7301	09/26/2014	B PLUG CEMENT TOP	6857
NIOBRARA	7000	7010	09/26/2014	B PLUG CEMENT TOP	6857

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	212	250	212	0	VISU
1ST	7+7/8	3+1/2	9.3	7,372	210	7,372	6,542	CALC
1ST LINER	3+1/2	2+3/8	4.7	6,900	0	6,900	1,806	CALC

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 6857 with 2 sacks cmt on top. CIBP #2: Depth 1805 with 2 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 _____ 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:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:

Perforate and squeeze at 5000 ft. with 215 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 285 sacks half in. half out surface casing from 653 ft. to 46 ft. Plug Tagged:
 Set 18 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: 556 ft. of 3+1/2 inch casing Plugging Date: 10/30/2014
 *Wireline Contractor: Magna *Cementing Contractor: Magna
 Type of Cement and Additives Used: _____
 Flowline/Pipeline has been abandoned per Rule 1103 Yes No *ATTACH JOB SUMMARY

Technical Detail/Comments:

Plugging Procedure
 Niobrara
 Codell
 Existing Perforations:
 Niobrara: 7000-7010'
 Codell: 7291-7301'
 PBTD: 7370'
 8 5/8" 24# @ 212' w/ 175 sks cmt.
 3.5" 11.6# @ 7372' w/ 210 sks cmt (TOC 6542')
 Procedure:
 1. MIRU wireline
 2. RIH w/ CIBP, set @ 6857'
 3. RIH w/dump bailer and dump 2 sx cement on top of CIBP @ 6857'
 4. TIH to shoot squeeze holes @ 5000'
 5. RIH and pump 215 sack plug
 6. TIH to tag plug @ 3160' (est TOC @3230' behind 3-1/2")
 7. RIH w/ liner cutter, cut & pull liner @ ~1806'
 8. RIH w/ CIBP, set @ 1805'
 9. Ran CBL from 1750'-surface. Est TOC @ 590'
 10. RIH w/ dump bailer and dump 2 sx cement on top of CIBP @ 1805'
 11. RIH w/ casing cutter, cut & pull casing @ 556'
 12. TIH set 285 sack plug @ 653'
 13. TIH to tag stub plug @ 46'
 14. Topped off surface plug with 18 sack plug to surface
 15. Cut casing 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: Christine Brookshire
 Title: REgulatory Tech Date: 3/10/2015 Email: Christine.Brookshire@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: George, Travis Date: 12/16/2015

CONDITIONS OF APPROVAL, IF ANY: _____

COA Type	Description

Attachment Check List

Att Doc Num	Name
400741985	FORM 6 SUBSEQUENT SUBMITTED
400806930	WELLBORE DIAGRAM
400806931	OPERATIONS SUMMARY

Total Attach: 3 Files

General Comments

User Group	Comment	Comment Date
Public Room	Document verification complete 12/16/15	12/16/2015 4:10:17 PM
Permit	Passed	11/20/2015 3:02:39 PM

Total: 2 comment(s)