



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

Well Name: Wolfe 5  
Location ID: 332814  
API #: 05-123-22826

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: Wolfe 5 Location ID: 332814 API #: 05-123-22826**  
**Section 32: SESW, 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 Wolfe 5 (API #: 05-123-22826) well head. PDC has plugged and abandoned (P&A) the former Wolfe 5 well in accordance with the requirements of Rule 1004.a. (Form 6 Subsequent Document Number: 400975217). Furthermore, in accordance with the surface owner's request (see Attachment A), PDC has left the former well head area in place. The surface owner(s), Mr. Joe Willkins III, has requested that PDC not remove/ reclaim the former Wolfe 5 well head area. The surface owner(s) has expanded the former well head area and would like to maintain the area to store extra material for their sod farm. This area will remain unfarmed.

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 Wolfe 5 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 well head area 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, CAEWM*

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 now Plugged and Abandoned Wolfe 5 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.pdce.com

July 30, 2020

Platteville Vista LLC  
6194 S Benton Ct  
Littleton, CO 80123

Re: **Final Reclamation Agreement**  
**Wolfe 5 (API 05-123-22826) Wellhead**  
Township 4 North, Range 66 West, 6th P.M.  
Section 32: SESW  
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 wellhead 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 wellhead area

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 area around the former wellhead 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.

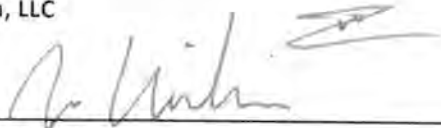
Respectfully,



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, 2020, 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 Altigracia Stone NOTARY PUBLIC STATE OF COLORADO NOTARY ID 20114071005 MY COMMISSION EXPIRES November 18, 2023
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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 5 (API 05-123-22826) Wellhead**  
Township 4 North, Range 66 West, 6th P.M.  
Section 32: SESW  
Weld County, Colorado



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

## Attachment B



August 31, 2020

**RE: Operator Demonstration for:**  
**Well Name: Wolfe 5 Location ID: 332814 API #: 05-123-22826**  
**Section 32: SESW, 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 Wolfe 5 (API #: 05-123-22826) well has been P&A as per the COGCC Rules and the Form 6 Subsequent has been submitted (Exhibit B: Document Number 400975217).

**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 Wolfe 5 well head area 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 Wolfe 5 well head area. The disturbance area for the former Wolfe 5 well head area is approximately 400 square feet. The surface owner(s) have expanded the former area and would like to maintain the well head area to store extra material for their sod farm. This area will remain unfarmed.

P&A for the Wolfe 5 well was finalized on December 18, 2015. 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 Wolfe 5 location.

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

The former Wolfe 5 well has been P&A and reclaimed in accordance with Rule 1004. The former Wolfe 5 well head is located approximately 0.10 mile north of County Road 38, approximately 335 feet west of the intersection with U.S. Hwy 85, and approximately 3.7 miles north of Platteville, Colorado. The well head area 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 Wolfe 5 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 Wolfe 5 well head is located approximately 0.10 mile north of County Road 38, approximately 335 feet west of the intersection with U.S. Hwy 85, and approximately 3.7 miles north of Platteville, Colorado. The former Wolfe 5 wellhead (40.262272, -104.801776) 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. This area will remain unfarmed. 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.

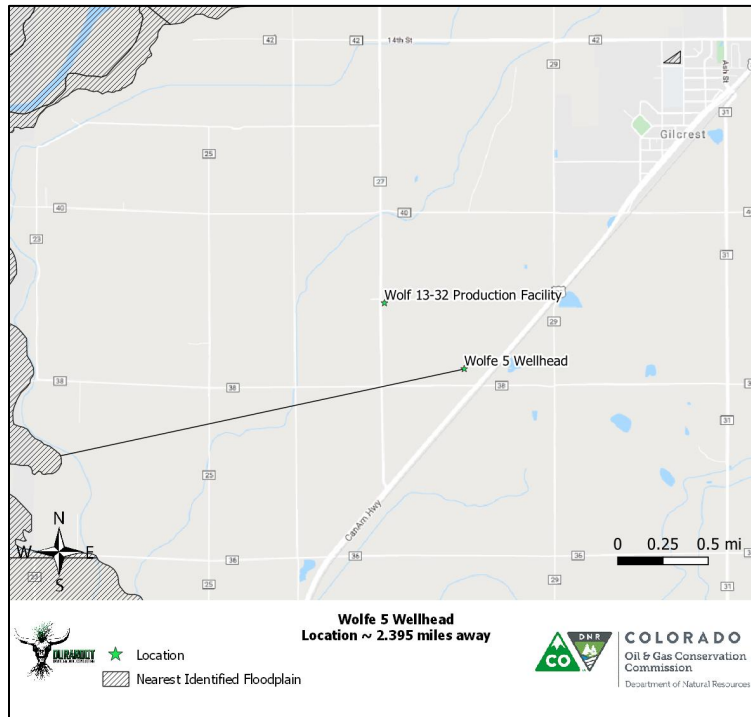
Environment

The former Wolfe 5 location does not fall within a Rule 317B Public Water System Protection area, according to the COGCC GIS “PWS 317B” mapping layer. The former Wolfe 5 location is approximately 1,190 feet from the nearest surface water according to several COGCC GIS “Water Resources” mapping layers (Figure 1). Due to the nature of this variance the Wolfe 5 location does not pose a risk to surface water.



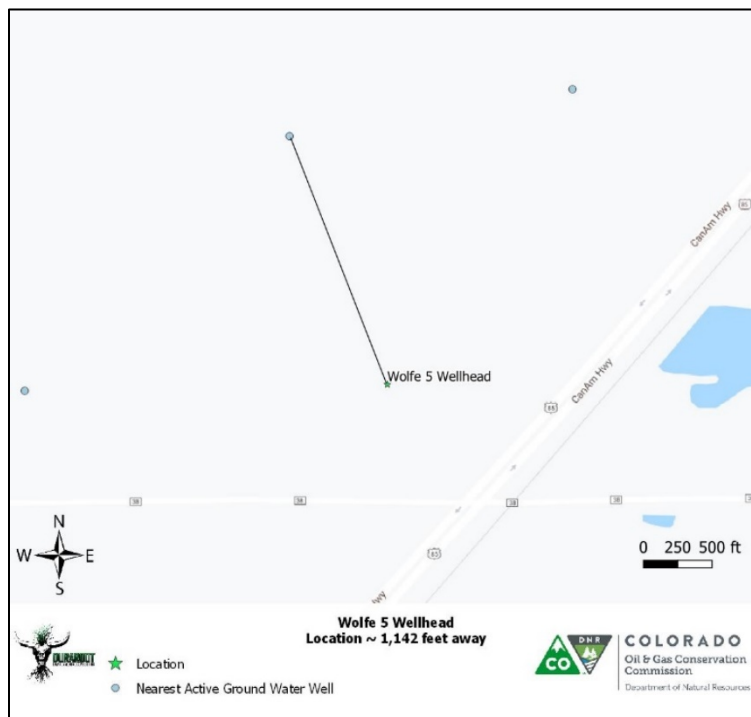
Figure 1. Distance to nearest surface water feature for the former Wolfe 5 location.

The former Wolfe 5 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 Wolfe 5 location.**

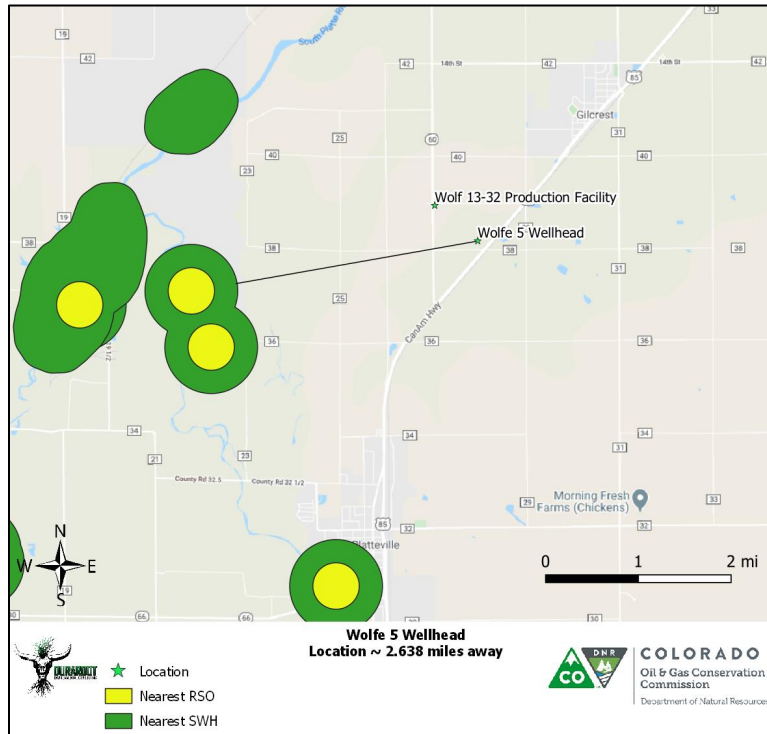
The former Wolfe 5 location is approximately 1,142 feet south of the nearest groundwater well, according to COGCC GIS “DWR\_Wells” mapping layer, which is based on Colorado’s DWR information (Figure 3).



**Figure 3. Distance to nearest groundwater well for the former Wolfe 5 location.**

## Wildlife

The former Wolfe 5 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 2.6 miles to the west.



**Figure 4. Distance to nearest Restricted Surface Occupancy (RSO) or Sensitive Wildlife Habitat (SWH) for the former Wolfe 5 location.**

Based on this evaluation it has been established that:

- given the small size of the variance request (400 square feet);
- 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 Wolfe 5 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.

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Facility:

Facility Type:

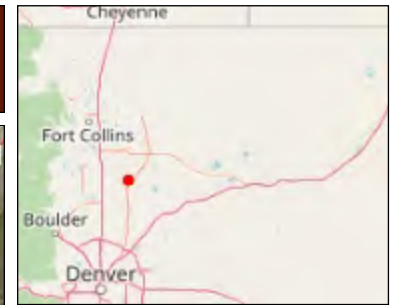
Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

Date Prepared:

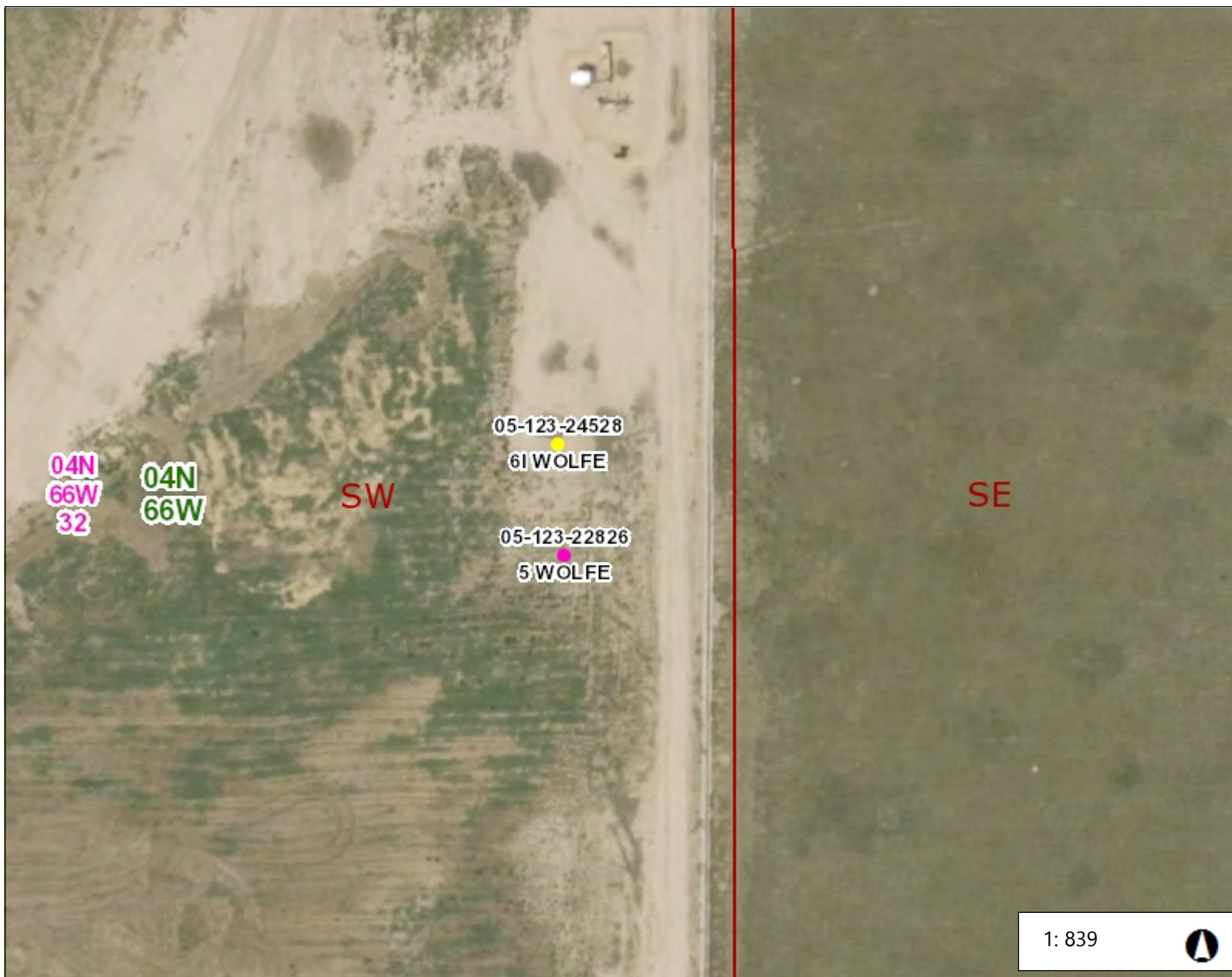


**Legend**

- 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**

1,118.5 0 559.27 1,118.5 Feet



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

1: 839



Notes

139.8 0 69.91 139.8 Feet

**Exhibit B:**

**Well Abandonment – Subsequent Form 6**

Document Number:  
400975217

Date Received:  
01/20/2016

**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: Kelsi Welch

Name of Operator: PDC ENERGY INC Phone: (303) 831-3974

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

City: DENVER State: CO Zip: 80203 Email: kelsi.welch@pdce.com

**For "Intent" 24 hour notice required,** Name: \_\_\_\_\_ Tel: \_\_\_\_\_

**COGCC contact:** Email: \_\_\_\_\_

API Number 05-123-22826-00

Well Name: WOLFE Well Number: 5

Location: QtrQtr: SESW Section: 32 Township: 4N Range: 66W 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: 40.262222 Longitude: -104.801667

GPS Data:  
Date of Measurement: 02/10/2010 PDOP Reading: 2.2 GPS Instrument Operator's Name: Brandon Lucason

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	7558	7872	12/18/2015	B PLUG CEMENT TOP	7508

Total: 1 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	415	280	415	0	VISU
1ST	7+7/8	4+1/2	11.6	7,675	750	7,675	3,610	CBL

## Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 7508 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 40 sks cmt from 5000 ft. to 4500 ft. Plug Type: CASING Plug Tagged:   
 Set 61 sks cmt from 742 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:   
 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: 6 ft. 8+5/8 inch casing Plugging Date: 12/18/2015  
 of \_\_\_\_\_  
 \*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:

Wolfe #5 (05-123-22826)/Plugging Procedure  
 Producing Formation: Codell  
 Existing Perforations: Codell 7558'-7872'  
 TD: 7677' PBD: 7592'  
 Surface Casing: 8 5/8" 24# @ 415' w/ 280 sks cmt.  
 Production Casing: 4 1/2" 11.6# @ 7675' w/ 750 sks cmt (TOC at surface).  
 Procedure:  
 1. MIRU pulling unit. TOOH with 2 7/8" tubing.  
 2. Rig up wireline company. TIH with CIBP. Set CIBP at 7508'. TIH with dump bailer. Spot 2 sxs of 15.8#/gal CI G cement on top of CIBP.  
 3. TIH with tubing to 5000'. RU cementers. Mix and pump 40 sxs of 15.8#/gal CI G cement.  
 4. TIH and Perforate at 615'. Mix and pump 61 sxs of 15.8#/gal CI G cement from 742'-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: Kelsi Welch  
 Title: Regulatory Analyst Date: 1/20/2016 Email: kelsi.welch@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: 7/12/2017

**CONDITIONS OF APPROVAL, IF ANY:**

**COA Type**

**Description**

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**Attachment Check List**

**Att Doc Num**

**Name**

400975217	FORM 6 SUBSEQUENT SUBMITTED
400975241	CEMENT JOB SUMMARY
400975246	WELLBORE DIAGRAM

Total Attach: 3 Files

**General Comments**

**User Group**

**Comment**

**Comment Date**

Agency	Need CBL run during plugging!!!!!!	04/07/2017
Permit	Form 7 is OK. CBL is doc 1175994.	11/04/2016

Total: 2 comment(s)