



1199 Main Ave., Suite 101  
Durango, Colorado 81301

November 16, 2020

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

RE: Final Reclamation Variance Request  
Location ID: 325941  
Location Name: Litton Federal Gas Unit-N35N7W  
Form 4 Document #: 402530568  
La Plata County, Colorado

Dear Director Murphy,

BP America Production Company (“BP”) (Operator No. 10000) hereby submits BP’s Final Reclamation Variance Request for the Litton Federal 1 wellsite pursuant to Rules 502.b and 1001.c. The Litton Federal 1 wellsite bears Location Identification Number 325941 and is in the NESE of Section 18, Township 35 North Range 7 West, in La Plata County, Colorado. As explained below, the requested variance satisfies both the Colorado Oil & Gas Conservation Commission’s (“COGCC’s”) obligations to protect public health, safety, welfare, the environment and wildlife resources, and the needs of Mr. Crenwelge, the surface owner of the property, who has requested that the land be left as is and agreed to take the land in its current condition. The Litton Federal 1 well (API 05-067-07205) was plugged and abandoned on October 3, 2016.

BP met onsite with the landowner in 2016 to determine the final reclamation requirements for the pad. The landowner requested the pad and access road not be reclaimed (see attached Landowner 2016 consultation) and BP began preparing a variance request for the COGCC. The original reclamation plan with the variance components are attached.

On 7/2/2019, the BLM requested a sundry and landowner agreement to request the site and access road be left in its current condition. A FAN was filed and approved by the BLM 8/13/2019. After a COGCC inspection attempt 9/24/2019, the COGCC called BP and requested a gate code for access for a final reclamation inspection. BP explained that a FAN had been approved by the BLM. During this conversation, the COGCC informed BP that due to a MOU between the BLM and COGCC final reclamation or a variance request would be required. BP began revising the variance request drafted in 2017 to meet the current COGCC guidelines for variances to accommodate the landowner’s request that the pad and access road not be reclaimed.

Per the original surface owner consultation in 2016, the surface owner requested that the Litton Federal 1 well site, after plugging and abandonment of the well, be designated by the surface owner for agricultural and recreational use. The location will remain flat with gravel. The area will be utilized for a hay storage building in the northwestern portion of the well pad and corrals/pens in the northeastern portion of the pad. The southern portion of the pad will be utilized as a turn around and parking for trucks and stock trailers and recreational vehicles during livestock gathering or hunting season.

Specifically, a variance is requested to COGCC Rule 1004.a, which requires final reclamation such that the land is left as near as practicable to the original condition. Here, per the Mr. Crenwelge's request, BP seeks to leave the Litton Federal 1 wellsite (approximately 0.9 acres) and the associated access road (approximately 0.28 acres) in place with no additional recontouring required. BP notes that the P&A marker has been placed below grade per the attached approved COGCC sundry.

The well site and access road (~1.21 acres) were left in place. Re-contouring was minimal to facilitate the surface owner's designated final land use. All disturbed areas are compacted, stabilized and covered with gravel that will remain in place to minimize new soil disturbance and minimize soil erosion.

The access road will remain fully compacted with gravel to serve as a secondary entrance/exit to the surface owner's property in the event of wild land fires. The access road will also serve as access to the well pad to accommodate the surface owner's designated use. (Note: a Warranty Deed is attached documenting the agreement between Mr. Crenwelge and the adjacent landowner for egress in the event of wild land fires and access to the pad as noted above)

A variance is also requested to COGCC Rules 1004.c(2) and 1004.d which require establishment of uniform vegetative cover of at least 80% of pre-disturbance or reference area levels. Since the surface owner has requested that the gravel be left on the well pad and access road the vegetative growth will not likely reach a total percentage plant cover of eighty percent (80%) of pre-disturbance or reference area levels; therefore, a variance to 1004.c.(2) is being requested. BP requests that no additional re-vegetation or weed-spraying activities be required on the Litton Federal 1 wellsite and that control of this site revert to Mr. Crenwelge.

The interim reclamation area of this well pad has established mature vegetation that will remain in place ensuring stabilization of the edge of the well pad and filtration/infiltration of any storm water flow off the southern portion of the well. (1002.f)

Per the response to Inspection #685303918 conducted on October 26, 2017, the equipment cited in this corrective action is not from BP America production activities. The Cattle guard, footers, fencing, stock panes and posts on the east side of location are the sole property of surface owner to be utilized for agricultural purposes. BP America is not responsible for nor can BP remove these items.

Finally, BP has monitored for noxious weed infestations and implemented weed control measures on the affected and reclaimed lands by removing all noxious weeds and using a preemergent herbicide to prevent future growth of weeds. The revegetation and weed removal work is likewise documented in the attached photographs.

These variances also meet the COGCC's obligations to protect public health, safety and welfare and the environment and wildlife resources as detailed below.

Public Health, Safety & Welfare:

- This well was properly plugged and all oil and gas equipment, including risers, materials, trash, and debris have been removed. Accordingly, the land does not contain any oil and gas improvements that could present a hazard, and all waste was removed. The P&A marker has been placed below grade to avoid any vehicular accidents that could occur with a standard above grade marker.
- This land is non-cropland that is used for cattle grazing and recreational purposes. The landowner will continue to use the land for this purpose.
- This is private land; no public access is permitted, and the surface owner has full control over the property.
- This site has no reportable spills or associated site-investigation/remediation actions. Nor are there any vessels or pits on the site. A pit was removed and reclaimed as part of completion of drilling operations.
- Previously established vegetation combined with reseeded of barren areas in the interim reclamation ensure that the site has long term stability. Additionally, the perimeter of the pad was contoured to divert runoff from the face of the sloped areas and drainage features were constructed along the north side of the well pad to allow drainage around the pad preventing storm water runoff from the hill coming on to the pad for long term stormwater management and site stability. Culverts were cleaned out along Lydic Lane and the access road for storm water management

Environment & Wildlife Resources:

- The location is in a sensitive wildlife area with mule deer habitat approximately 0.57 miles to the south of the well pad. No major water resources are within in the vicinity of the well pad. The water resources and wildlife habitat are depicted in the attached excerpts from the COGCC interactive map.
- Environmental impacts are unlikely because the well was properly plugged on October 3, 2016 and all oil and gas equipment, including risers, materials, trash, and debris have been removed. Accordingly, the land does not contain any oil and gas improvements that could present a hazard, and all waste was removed during reclamation.
- The site is currently used for agricultural and recreational purposes and it will continue to be used for that purpose.
- The potential for stormwater impacts are mitigated by stormwater BMPs which will prevent runoff.

And finally, the variance is desired by the surface owner. During the original surface owner consultation with the Mr. Crenwelge in 2016, the surface owner mandated that the Litton Federal 1 wellsite be left as-is. The landowner request was memorialized in a written agreement signed and notarized August 2, 2019, which provides that "Landowner desires for BP to abandon the Location, and its associated lease road and pipeline right-of-way "as-is." See August 2, 2019 Letter Agreement attached. After additional consultations in late 2019 and early 2020, the Mr. Crenwelge continues to desire that the Litton Federal 1 well site be left as-is for use for agricultural management and as a recreational site.

Mr. Crenwelge hereby agrees to take responsibility for future reclamation and topsoil protection and has waived the COGCC reclamation requirements under Rules 1004.a, 1004.c(2), and 1004.d in perpetuity.

Thank you for considering this request for Rule 502.b variance.

Should you have any additional questions, please contact Kyle Kerr, BP North Area Manager at (970) 317-0623.

Sincerely,

*Patti Campbell*

Patti Campbell  
Regulatory Analyst, BP West Business Unit

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

FORM APPROVED  
OMB NO. 1004-0137  
Expires: January 31, 2018

**SUNDRY NOTICES AND REPORTS ON WELLS**  
*Do not use this form for proposals to drill or to re-enter an abandoned well. Use form 3160-3 (APD) for such proposals.*

5. Lease Serial No.  
COC17126

6. If Indian, Allottee or Tribe Name

7. If Unit or CA/Agreement, Name and/or No.

**SUBMIT IN TRIPLICATE - Other instructions on page 2**

1. Type of Well  
 Oil Well  Gas Well  Other: COAL BED METHANE

8. Well Name and No.  
LITTON FEDERAL 1

2. Name of Operator Contact: PATTI CAMPBELL  
BP AMERICA PRODUCTION COMPANY Mail: patti.campbell@bpx.com

9. API Well No.  
05-067-07205-00-S1

3a. Address  
1199 MAIN AVENUE SUITE 101  
DURANGO, CO 81301

3b. Phone No. (include area code)  
Ph: 970-712-5997

10. Field and Pool or Exploratory Area  
IGNACIO BLANCO

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)  
Sec 18 T35N R7W NESE 1650FSL 1070FEL

11. County or Parish, State  
LA PLATA COUNTY, CO

**12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA**

TYPE OF SUBMISSION	TYPE OF ACTION			
<input type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Hydraulic Fracturing	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input checked="" type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other Final Abandonment Notice
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplete horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has determined that the site is ready for final inspection.

BP met onsite prior to the P&A of the referenced well and discussed reclamation. The landowner requested the location be left flat with gravel to meet their long term use of the land.

BP is requesting the approval of the final abandonment of the referenced site per the landowner request.

A copy of the signed landowner abandonment agreement is attached.

14. I hereby certify that the foregoing is true and correct.

**Electronic Submission #477378 verified by the BLM Well Information System  
For BP AMERICA PRODUCTION COMPANY, sent to the Durango  
Committed to AFMSS for processing by ASHLEY HITCHHELL on 08/12/2019 (19ACH0115SE)**

Name (Printed/Typed) PATTI CAMPBELL

Title REGULATORY ANALYST

Signature (Electronic Submission)

Date 08/09/2019

**THIS SPACE FOR FEDERAL OR STATE OFFICE USE**

Approved By JOHN PECOR

Title MINERALS STAFF CHIEF

Date 08/13/2019

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office Durango

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

**\*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\***

## Revisions to Operator-Submitted EC Data for Sundry Notice #477378

	<b>Operator Submitted</b>	<b>BLM Revised (AFMSS)</b>
Sundry Type:	FAN FAN	FAN FAN
Lease:	COC17126	COC17126
Agreement:	COC49724	
Operator:	BP AMERICA PRODUCTION COMPANY 1199 MAIN AVE. SUITE 101 DURANGO, CO 81301 Ph: 970-712-5997	BP AMERICA PRODUCTION COMPANY 1199 MAIN AVENUE SUITE 101 DURANGO, CO 81301 Ph: 970.335.3828
Admin Contact:	PATTI CAMPBELL REGULATORY ANALYST E-Mail: patti.campbell@bpx.com  Ph: 970-712-5997	PATTI CAMPBELL REGULATORY ANALYST E-Mail: patti.campbell@bpx.com  Ph: 970-712-5997
Tech Contact:	PATTI CAMPBELL REGULATORY ANALYST E-Mail: patti.campbell@bpx.com  Ph: 970-712-5997	PATTI CAMPBELL REGULATORY ANALYST E-Mail: patti.campbell@bpx.com  Ph: 970-712-5997
Location:		
State:	CO	CO
County:	LA PLATA COUNTY	LA PLATA
Field/Pool:	IGNACIO BLANCO	IGNACIO BLANCO
Well/Facility:	LITTON FEDERAL 1 Sec 18 T35N R7W Mer NMP NESE 1650FSL 1070FEL	LITTON FEDERAL 1 Sec 18 T35N R7W NESE 1650FSL 1070FEL

## LITTON FEDERAL #1 ABANDONMENT AGREEMENT

This Litton Federal #1 Abandonment Agreement ("Agreement") is made this 2nd day of August, 2019, by and between BP America Production Company ("BP") and Dale A. Crenwelge & Abbie Higgins-Crenwelge, with a mailing address of PO Box 717, Comfort, TX 78013 ("Landowner").

WHEREAS, BP is or was the Operator, on behalf of itself, its affiliates and its working interest partners of the oil and gas well and well site described and located as follows:

Litton Federal #1 well, API # 05-067-07205, located in the NESE Section 18, Township 35 North, Range 7 West, La Plata County, Colorado (hereafter the "Location");

WHEREAS, BP and Landowner, or their respective predecessors in interest, entered into a Surface Use Agreement for the Litton Federal #1 well, dated November 4, 1988 and recorded in the La Plata County Clerk and Recorders Office under Reception Number 699970 ("Litton #1 SUA");

WHEREAS, BP and Landowner, or their respective predecessors in interest, entered into a Right-of-Way Agreement relating to the Litton Federal #1 well, dated January 3, 1989 and recorded May 10, 1989 under Reception Number 577971 in the office of the La Plata County Clerk & Recorder ("Litton #1 ROW Agreement");

WHEREAS, BP plans to seek Colorado Oil and Gas Conservation Commission ("COGCC") approval of a variance to COGCC Rule 1004 ("Variance");

WHEREAS, subject to approval of the Variance, BP intends to abandon the Location, and its associated lease road and pipeline right-of-way "as is," and seeks to be released of reclamation obligations arising from, including but not limited to, the Litton #1 SUA, the Litton #1 ROW Agreement, common law, the laws of the state of Colorado, and the Rules and Regulations of the Colorado Oil & Gas Conservation Commission;

WHEREAS, Landowner desires for BP to abandon the Location, and its associated lease road and pipeline right-of-way "as is" and relieve BP of any reclamation obligations arising from, including but not limited to, the Litton #1 SUA, the Litton #1 ROW Agreement, common law, the laws of the state of Colorado, and the Rules and Regulations of the Colorado Oil & Gas Conservation Commission;

WHEREAS, Additionally, Landowner and BP mutually desire for BP to cut and cap and abandon-in-place the water and gas pipelines serving the Litton Federal #1 well;

NOW THEREFORE, for good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by both parties, BP and Landowner agree as follows:

1. All rights and obligations under this Agreement will arise upon COGCC approval of the Variance.
2. Upon COGCC approval of the Variance, Landowner accepts the Location "as is" and in its current condition and assumes any and all responsibility for restoration of the Location.
3. Upon approval of the Variance, BP will:
  - a. abandon the Location and its respective lease road and pipeline right-of-way;
  - b. release the Litton #1 SUA and Litton #1 ROW Agreement;
  - c. cut and cap and abandon in-place the water and gas pipelines serving the Litton Federal #1 well.
4. BP and Landowner agree that the Litton Federal #2 well, API No. 05-067-09079, and associated agreements are not subject to this Agreement.
5. Landowner, on behalf of itself, and all Landowner's heirs, successors and assigns, hereby releases, waives, acquits and forever fully and finally discharges BP, its officers, directors, shareholders, employees, agents, subsidiaries and affiliated entities, successors and assigns ("Releasees") of and from any and all actions, causes of action, losses, damage, liabilities, demands and claims of every kind and nature whatsoever, whether now known or unknown, foreseen or unforeseen, in law or equity, which it has or may have arising from or in any way related to the Location, and its associated lease road and pipeline right-of-way, including but not limited to all claims for past, present or future injuries or damages

to other property (including surface and subsurface soil and waters) owned by Landowner arising from erosion, silting, movement of groundwater, noxious weeds, nuisances, security issues or other injuries and damages which affect or impact Landowner's property as a result of the Location and its associated lease road and pipeline right-of-way.

6. Landowner further releases BP from any and all obligations imposed upon BP or Releasees to restore and/or revegetate the Location and its associated lease road and pipeline right-of-way under the Litton #1 SUA, the Litton #1 ROW Agreement, common law, the laws of the state of Colorado, and the Rules and Regulations of the Colorado Oil & Gas Conservation Commission such that BP has no obligation to perform any restorative or revegetative work on the Location and its associated lease road and pipeline right-of-way.

7. This Agreement binds the parties hereto, their heirs, successors and assigns and will run with the land and be binding upon Landowner's successors entitled to the property which is the subject to this Agreement.

8. Landowner represents and warrants to BP that Landowner owns 100% of the right, title and interest in and to the surface tract of the Location and Landowner agrees to indemnify and hold BP harmless from any and all claims asserted by any landlord, tenant, lien holder or other owner of the property asserting an interest or rights adverse or contrary to the interest warranted by Landowner herein.

Executed this 2 day of <sup>August</sup> ~~July~~, 2019.

**BP AMERICA PRODUCTION COMPANY**

John Mummy  
By: John Mummy, VP of Operations West BU

**LANDOWNER**

Dale A. Crenwelge  
By: Dale A. Crenwelge  
Abbie Higgins-Crenwelge  
By: Abbie Higgins-Crenwelge

**ACKNOWLEDGEMENT**

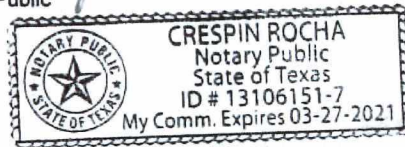
STATE OF Texas )  
COUNTY OF Kendall )ss:

On this 2 day of August, 2019, personally came before me, a Notary Public in and for the State of ~~Colorado~~ Texas, the within named, Dale A. Crenwelge and Abbie Higgins-Crenwelge, to me personally known to be the identical person(s) described in and who executed the within and foregoing instrument and acknowledged to me that they executed the same as their free and voluntary act and deed, for the uses and purposes therein mentioned.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

Crespin Rocha  
Notary Public

My Commission Expires: 03-27-21



**ACKNOWLEDGEMENT**

STATE OF COLORADO)

)ss:

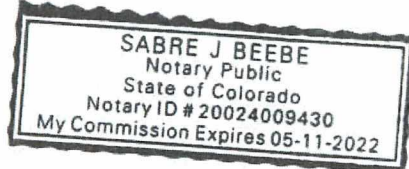
COUNTY OF LA PLATA)

On this 8<sup>th</sup> day of August, 2019, personally came before me, a Notary Public in and for the State of Colorado, the within named, John Mummery, as VP of Operations West BU, for BP America Production Company, to me personally known to be the identical person(s) described in and who executed the within and foregoing instrument and acknowledged to me that she executed the same as her free and voluntary act and deed, for the uses and purposes therein mentioned.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

My Commission Expires: 05/01/2022

  
Notary Public



## Operator Final Reclamation Consultation Form

Rule 306.f. Final Reclamation Consultation  
(Attachment)

Date: October 2, 2016					Specialist: Sabre Beebe, BP & Miles Venzara, BP					
Operator: BP America					Well Name & Number: Litton Federal #1					
API Number: 30-045-07205					Section: 18		Township: 35 N		Range: 7W	
Lease Number: C-17126					Footage: 1650' FSL 1070' FEL					
					County: LaPlata			State: Colorado		
Surface:	BLM	BOR	State	Private	Twinned:		Yes		No	
Topography: Mountains /30 to 75 percent slopes					Stockpile Topsoil		Yes		No	
Soil Type: Weminuche loam										
Vegetation Community: Primarily Forested area with native grasses for grazing										

Vegetation Cages:  Yes  No

Facilities on Location:  Tanks  Meter Runs  Separators  Compressor  Day Tanks  
 Pipeline riser

Gravel Present:  Yes  No Bury  Yes  No Main Road: Shall remain intact per land owner and adjacent land owner

Steel Pits: **Above Grade** / Below Grade: Where on Location: North west corner of location 21 barrel above grade tank that will be removed from location.

Cathodic Groundbed on location:  Yes  No

In Service:  Yes  No Abandoned:  Yes  No Plugged:  Yes  No

Remove Wire  Remove Rectifier

Trash on location:  Yes  No Power Poles:  Yes  No Remove Power Poles:  Yes  No

Construction Diversion Ditch:  Above  Below  Around

North Side draining east and west around pad		Contaminated Soil: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Side draining		Remove: <input type="checkbox"/> Yes, where on location:	

Construction Silt Trap(s): Land owner has requested that the well pad remain flat for future use for a hay storage building, animal stalls and recreational vehicle parking

Re-Contour Disturbed Areas to Natural Terrain:  Yes  No

Special Features: Well pad is located at the base of a hill and therefore the diversion ditch will be reconstructed around the north side of pad to redirect storm water off of the hill around the well pad.

Location & Access Barricade:  Yes  No / How: The landowner has requested the access road be left in place as is with minor erosion repairs.

Construction Comments / Concerns: \_\_\_\_\_

### Access Road

Access Length: 1/3 of a mile Remediation Methods:  Rip  Disk  Water Bars  Re-establish Drainages

Other: Road is to remain in place / landowner requests the cattle guard remain as it belongs to landowner.


Access Condition:  Below Grade  Above Grade

Other: \_\_\_\_\_

Culverts:  Yes  No Cattle Guard:  Yes  No Reconstruct Fence:  Yes  No Surface

Material:  Yes  No

What to do with Material	Road and pad to be left in place
--------------------------	----------------------------------

Road Comments/Concerns	
Reclamation Plan	<p>Landowner has requested that the well pad be left flat with gravel spread evenly so that landowner can place a hay barn and cattle pens at the back of the pad. Landowner has requested that the above grade be replaced with a below grade marker to accommodate for parking of recreational vehicles, stock and horse trailers and trucks without risk of striking the marker. All equipment, automation equipment and pipeline shall be stripped from location and disposed of.</p> <p>Preplugging illustration:</p> 

Yes		No		Right of Way
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leave access road as is with gravel		
<input type="checkbox"/>	<input type="checkbox"/>	Leave access road as is with seeding		
<input type="checkbox"/>	<input type="checkbox"/>	Reclaim right of way to near natural contour, seed and mulch		
<input type="checkbox"/>	<input type="checkbox"/>	Other:		

Yes		No		Well pad
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leave access well pad flat / as is with gravel		
<input type="checkbox"/>	<input type="checkbox"/>	Leave access well pad flat with seeding		
<input type="checkbox"/>	<input type="checkbox"/>	Reclaim well pad to near natural contour, seed and mulch		

		Other: All piping and automation cables to be removed
--	--	--

Yes	No	Pit
		Leave access as is
		Reclaim pit to near natural contours and re-seed
x		Other: N/A pit was removed and reclaimed as part of completions of drilling operations

Yes	No	Work to be completed by Operator
x		Remove fencing at: north and south side of well pad
		Remove gate at:
x		Repair culverts at: Clean out culvert on south west side of pad going under entrance road
		Other:

Comments/Other: Upon landowner approval of above outlined work completion the land owner understands that the maintenance of storm water BMP's and Noxious weed control per Colorado State Law and La Plata County Rules becomes their sole responsibility.

Discussed this 2nd day of October, 2016

**Note: THIS FORM IS FOR THE PURPOSE OF OBTAINING SURFACE OWNER REQUESTS REGARDING THE MATTERS SET FORTH ABOVE AND EXECUTION OF THIS FORM IS NOT INTENDED TO CREATE A BINDING AGREEMENT. ALL REQUESTS ARE SUBJECT TO OPERATOR & COGCC APPROVAL AND IN ACCORDANCE WITH ALL GOVERNMENTAL REGULATIONS IN EFFECT.**

**OPERATOR IS NOT RESPONSIBLE FOR MAINTENANCE ON WELL PADS OR RIGHTS OF WAY LEFT IN "AS IN" CONDITION.**

**THIS IS NOT A BINDING AGREEMENT.**

**LITTON FEDERAL #1 ABANDONMENT AGREEMENT**

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WHEREAS, BP plans to seek Colorado Oil and Gas Conservation Commission ("COGCC") approval of a variance to COGCC Rule 1004 ("Variance");

WHEREAS, subject to approval of the Variance, BP intends to abandon the Location, and its associated lease road and pipeline right-of-way "as is," and seeks to be released of reclamation obligations arising from, including but not limited to, the Litton #1 SUA, the Litton #1 ROW Agreement, common law, the laws of the state of Colorado, and the Rules and Regulations of the Colorado Oil & Gas Conservation Commission;

WHEREAS, Landowner desires for BP to abandon the Location, and its associated lease road and pipeline right-of-way "as is" and relieve BP of any reclamation obligations arising from, including but not limited to, the Litton #1 SUA, the Litton #1 ROW Agreement, common law, the laws of the state of Colorado, and the Rules and Regulations of the Colorado Oil & Gas Conservation Commission;

WHEREAS, Additionally, Landowner and BP mutually desire for BP to cut and cap and abandon-in-place the water and gas pipelines serving the Litton Federal #1 well;

NOW THEREFORE, for good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by both parties, BP and Landowner agree as follows:

1. All rights and obligations under this Agreement will arise upon COGCC approval of the Variance.
2. Upon COGCC approval of the Variance, Landowner accepts the Location "as is" and in its current condition and assumes any and all responsibility for restoration of the Location.
3. Upon approval of the Variance, BP will:
  - a. abandon the Location and its respective lease road and pipeline right-of-way;
  - b. release the Litton #1 SUA and Litton #1 ROW Agreement;
  - c. cut and cap and abandon in-place the water and gas pipelines serving the Litton Federal #1 well.
4. BP and Landowner agree that the Litton Federal #2 well, API No. 05-067-09079, and associated agreements are not subject to this Agreement.
5. Landowner, on behalf of itself, and all Landowner's heirs, successors and assigns, hereby releases, waives, acquits and forever fully and finally discharges BP, its officers, directors, shareholders, employees, agents, subsidiaries and affiliated entities, successors and assigns ("Releasees") of and from any and all actions, causes of action, losses, damage, liabilities, demands and claims of every kind and nature whatsoever, whether now known or unknown, foreseen or unforeseen, in law or equity, which it has or may have arising from or in any way related to the Location, and its associated lease road and pipeline right-of-way, including but not limited to all claims for past, present or future injuries or damages

Return to:  
BP America  
1199 Main Ave Suite 101 Durango CO 81301



STATE OF COLORADO)

)ss:

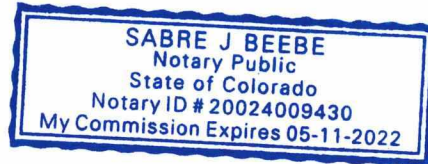
COUNTY OF LA PLATA)

On this 8<sup>th</sup> day of August, 2019, personally came before me, a Notary Public in and for the State of Colorado, the within named, John Mummery, as VP of Operations West BU, for BP America Production Company, to me personally known to be the identical person(s) described in and who executed the within and foregoing instrument and acknowledged to me that she executed the same as her free and voluntary act and deed, for the uses and purposes therein mentioned.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

My Commission Expires: 05/11/2022

  
Notary Public



**WARRANTY DEED**

State Doc Fee: \$91.50  
Recording Fee: \$26.00

THIS DEED, is dated the 7th day of January, 2014, and is made between

Kay Lynn Wilcox and Colorado Dreamer, L.L.C., an Arizona Limited Liability Company

(whether one, or more than one), the "Grantor," of the County of Pima and State of Arizona and

Dale A. Crenwelge and Abbie Higgins-Crenwelge

the "Grantees," whose legal address is: PO Box 717, Comfort TX 78013 of the County of Kendall and State of Texas

WITNESS, that the Grantor, for and in consideration of the sum of ( \$915,000.00 ) Nine Hundred Fifteen Thousand dollars and Zero cents, the receipt and sufficiency of which is hereby acknowledged, hereby grants, bargains, sells, conveys and confirms unto the Grantees and the Grantees' heirs and assigns forever, not in tenancy in common but in joint tenancy, all the real property, together with any improvements thereon, located in the County of La Plata and State of Colorado described as follows:

The Northwest Quarter (NW¼) and the West Half of the Southwest Quarter (W½SW¼) of Section Seventeen (17); the East Half of the Northeast Quarter (E½NE¼) and East Half of the Southeast Quarter (E½SE¼) of Section Eighteen (18); the East Half of the Northeast Quarter (E½NE¼) of Section Nineteen (19); the Northwest Quarter of the Northwest Quarter (NW¼NW¼) of Section Twenty (20), all in Township Thirty-Five (35) North, Range Seven (7) West , N.M.P.M., County of La Plata, State of Colorado.

also known by street and number as: TBD County Road 502, Bayfield, CO 81122

TOGETHER with all and singular the hereditaments and appurtenances thereto belonging, or in anywise appertaining, the reversions, remainders, rents, issues and profits thereof, and all the estate, right, title, interest, claim and demand whatsoever of the Grantor, either in law or equity, of, in and to the above bargained premises, with the hereditaments and appurtenances;

TO HAVE AND TO HOLD the said premises above bargained and described, with the appurtenances, unto the Grantees, and the Grantees' heirs and assigns forever.

The Grantor, for the Grantor and the Grantor's heirs and assigns, does covenant, grant, bargain, and agree to and with the Grantees, and the Grantees' heirs and assigns: that at the time of the ensembling and delivery of these presents, the Grantor is well seized of the premises above described; has good, sure, perfect, absolute and indefeasible estate of inheritance, in law, and in fee simple; and has good right, full power and lawful authority to grant, bargain, sell and convey the same in manner and form as aforesaid; and that the same are free and clear from all former and other grants, bargains, sales, liens, taxes, assessments, encumbrances and restrictions of whatever kind or nature soever, except and subject to:

See Attached Exhibit 1

And the Grantor shall and will WARRANT AND FOREVER DEFEND the above-described premises, but not any adjoining vacated street or alley, if any, in the quiet and peaceable possession of the Grantees, and the heirs and assigns of the Grantees, against all and every person or persons lawfully claiming the whole or any part thereof.

IN WITNESS WHEREOF, the Grantor has executed this deed on the date set forth above.

  
Kay Lynn Wilcox, nka Kay Lynn LaRochelle

Colorado Dreamer, LLC  
  
Kay Lynn Wilcox, nka Kay Lynn LaRochelle,  
Managing Member



---

**EXHIBIT 1**  
**EXCEPTIONS**

1. Distribution utility easements (including cable TV).
2. Those specifically described rights of third parties not shown by the public records of which Buyer has actual knowledge and which were accepted by Buyer in accordance with paragraph 8.2 of contract Form No. CBS 4-9-12 [Matters Not Shown by the Public Records].
3. Inclusion of the Property within any special taxing district.
4. Unpatented mining claims; reservations or exceptions in patents, or an act authorizing the issuance thereof; water rights, claims or title to water.
5. Taxes for the year 2013 and subsequent years not yet due and payable.
6. Any vested and accrued water rights for mining, agricultural, manufacturing, or other purposes, and rights to ditches and reservoirs used in connection with such water rights, as may be recognized and acknowledged by the local customs, laws and decisions of courts; and there is reserved from the lands hereby granted, a right of way thereon for ditches or canals constructed by the authority of the United States; and excepting and reserving, however, to the United States all the coal and other minerals in the lands so entered and patented, together with the right to prospect for, mine and remove the same pursuant to the provision and limitations of the Act of December 29, 1916 (39 Stat. 862) as set forth in United States Patent recorded September 23, 1935 in Book 198 at Page 113, and any and all assignments thereof or interests therein. The Company makes no representation as to the present ownership of any such interests. There may be leases, grants, exceptions or reservations of interests that are not listed.
7. Any vested and accrued water rights for mining, agricultural, manufacturing, or other purposes, and rights to ditches and reservoirs used in connection with such water rights, as may be recognized and acknowledged by the local customs, laws and decisions of courts; and there is reserved from the lands hereby granted, a right of way thereon for ditches or canals constructed by the authority of the United States. Reserving, also, to the United States, all coal in the land so granted, and to it, or persons authorized by it, the right to prospect for, mine and remove coal from the same upon compliance with the conditions of and subject to the limitations of the Act of June 22, 1910 (36 Stat. 583). Excepting and reserving, also, to the United States all the oil and gas in the land so patented, and to it, or persons authorized by it, the right to prospect for, mine and remove such deposits from the same upon compliance with

the conditions and subject to the provisions of the Act of July 17, 1914 (38 Stat. 509) as set forth in United States Patent recorded March 31, 1955 in Book 343 at Page 254, and any and all assignments thereof or interests therein. The Company makes no representation as to the present ownership of any such interests. There may be leases, grants, exceptions or reservations of interests that are not listed.

8. Right of Way Agreement between R.L. Litton and Olga Litton and Amoco Production Company recorded March 28, 1989 as Reception No. 576258.
9. Surface Use Agreement between R.L. Litton and Amoco Production Company recorded march 31, 1995 as Reception No. 684891.
10. The effect of Right of Way Agreement between The Wilbourn Estate and R.L. Litton recorded October 3, 1995 as Reception No. 694838.
11. Surface Use Agreement between R. L. Litton and Amoco Production Company recorded January 10, 1996 as Reception No. 699970.
12. Surface Use Agreement between BP America Production Company and Kay Lynn Wilcox, Personal Representative of The Estate of Rege Lee Litton, a/k/a Rege L. Litton, a/k/a R.L. Litton, deceased and Kay Lynn Wilcox recorded August 18, 2005 as Reception No. 916000.
13. All matters as shown on survey by Jeff K. Helmer dated December 19, 2013.

RIGHT-OF-WAY AGREEMENT

The Wilbourn Estate, Clyde attorney in fact, will grant to R. L. Litton, or anyone designated by R. L. Litton, access from County Road 502 through the NE $\frac{1}{4}$  of the NW $\frac{1}{4}$  of Section 19, Township 35 North, Range 7 West, New Mexico Principal Meridian, La Plata County, Colorado, proceeding through the E $\frac{1}{2}$  of the SW $\frac{1}{4}$  of Section 18 of the same township to a parcel of land in the E $\frac{1}{2}$  of the SE $\frac{1}{4}$  of Section 18 Township 35 North, Range 7 West, owned by R. L. Litton. Said right-of-way will consist of a corridor approximately 25 feet in width, and approximately 4900 feet in length. Said right-of-way agreement shall remain valid while the parcel of land in the E $\frac{1}{2}$  of the SE $\frac{1}{4}$  of Section 18 remains in the possession of R. L. Litton.

10  
13  
15  
C. L. Wilbourn  
C. L. Wilbourn

11/5/88  
Date

R. L. Litton  
R. L. Litton

11-5-88  
Date



## Litton Federal 1 Compliance Demonstration

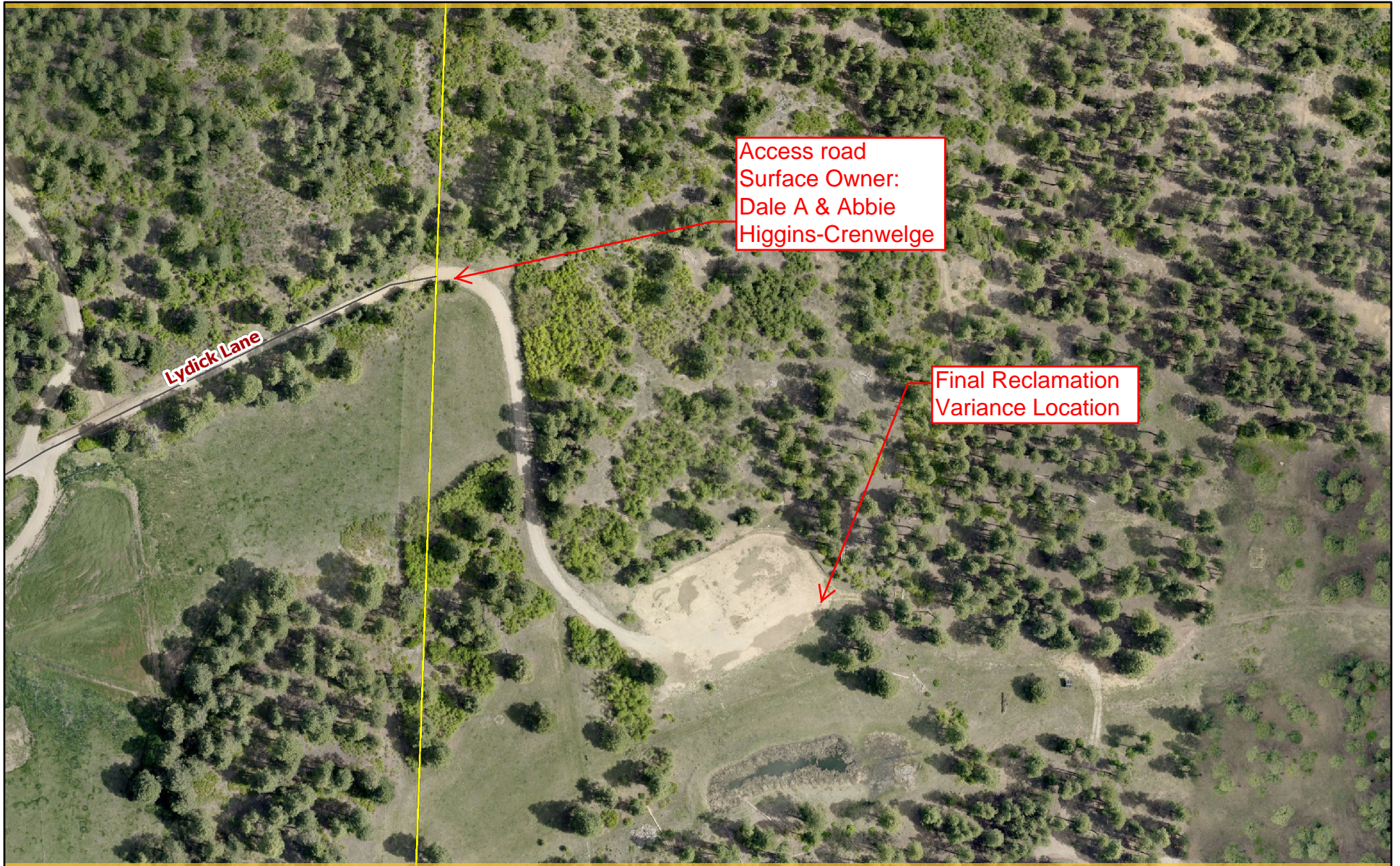
### Public Health, Safety & Welfare:

- This well was properly plugged and all oil and gas equipment, including risers, materials, trash, and debris have been removed. Accordingly, the land does not contain any oil and gas improvements that could present a hazard, and all waste was removed. The P&A marker has been placed below grade to avoid any vehicular accidents that could occur with a standard above grade marker.
- This land is non-cropland that is used for cattle grazing and recreational purposes. The landowner will continue to use the land for this purpose.
- This is private land; no public access is permitted, and the surface owner has full control over the property.
- This site has no reportable spills or associated site-investigation/remediation actions. Nor are there any vessels or pits on the site. A pit was removed and reclaimed as part of completion of drilling operations.
- Previously established vegetation combined with reseeded of barren areas in the interim reclamation ensure that the site has long term stability. Additionally, the perimeter of the pad was contoured to divert runoff from the face of the sloped areas and drainage features were constructed along the north side of the well pad to allow drainage around the pad preventing storm water runoff from the hill coming on to the pad for long term stormwater management and site stability. Culverts were cleaned out along Lydic Lane and the access road for storm water management

### Environment & Wildlife Resources:

- The location is in a sensitive wildlife area with mule deer habitat approximately 0.57 miles to the south of the well pad. No major water resources are within in the vicinity of the well pad. The water resources and wildlife habitat are depicted in the attached excerpts from the COGCC interactive map.
- Environmental impacts are unlikely because the well was properly plugged on October 3, 2016 and all oil and gas equipment, including risers, materials, trash, and debris have been removed. Accordingly, the land does not contain any oil and gas improvements that could present a hazard, and all waste was removed during reclamation.
- The site is currently used for agricultural and recreational purposes and it will continue to be used for that purpose.
- The potential for stormwater impacts are mitigated by stormwater BMPs which will prevent runoff.

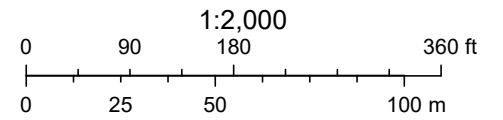
# Variance Location & Access Road



Access road  
Surface Owner:  
Dale A & Abbie  
Higgins-Crenwelge

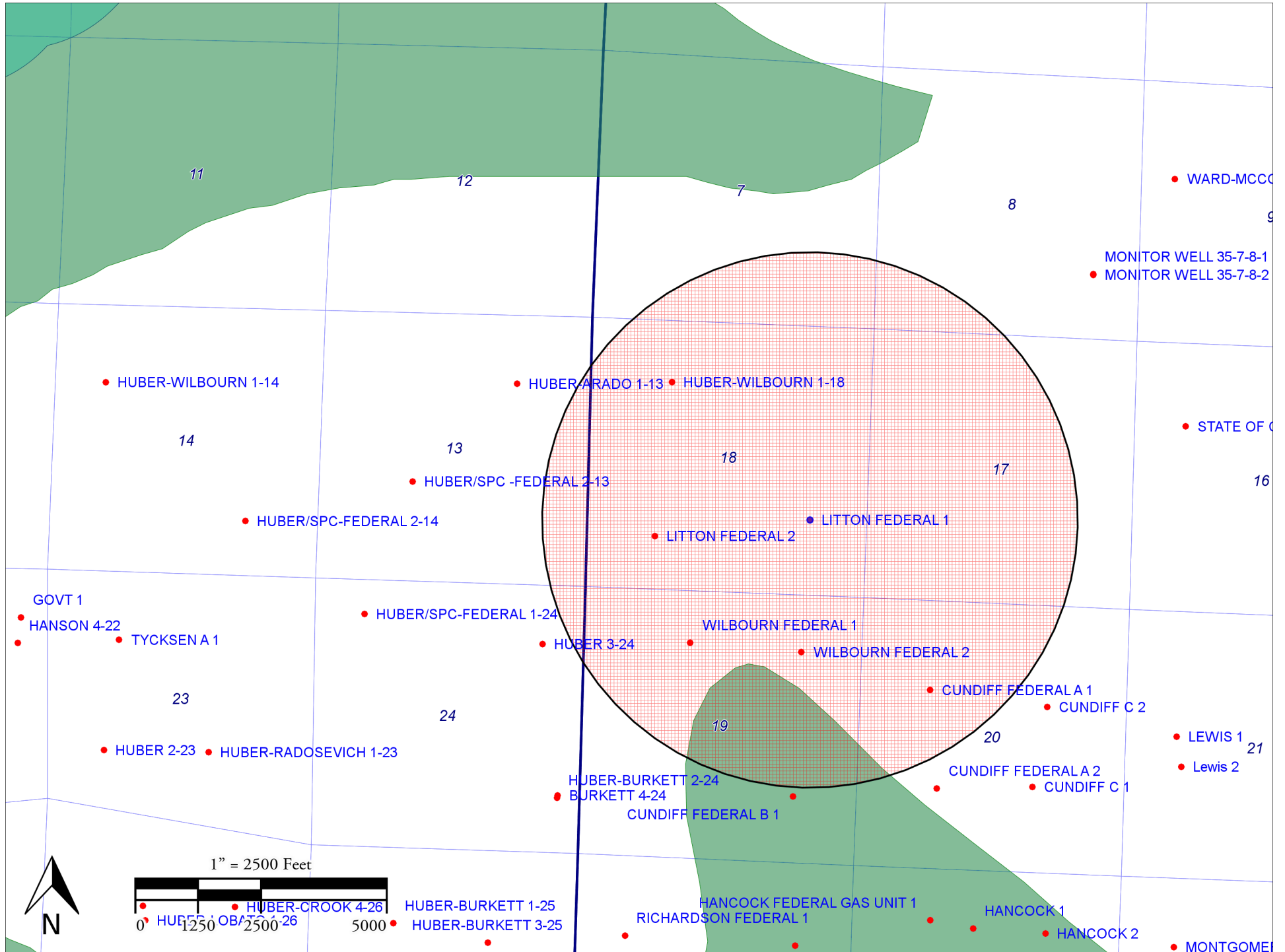
Final Reclamation  
Variance Location

November 11, 2020

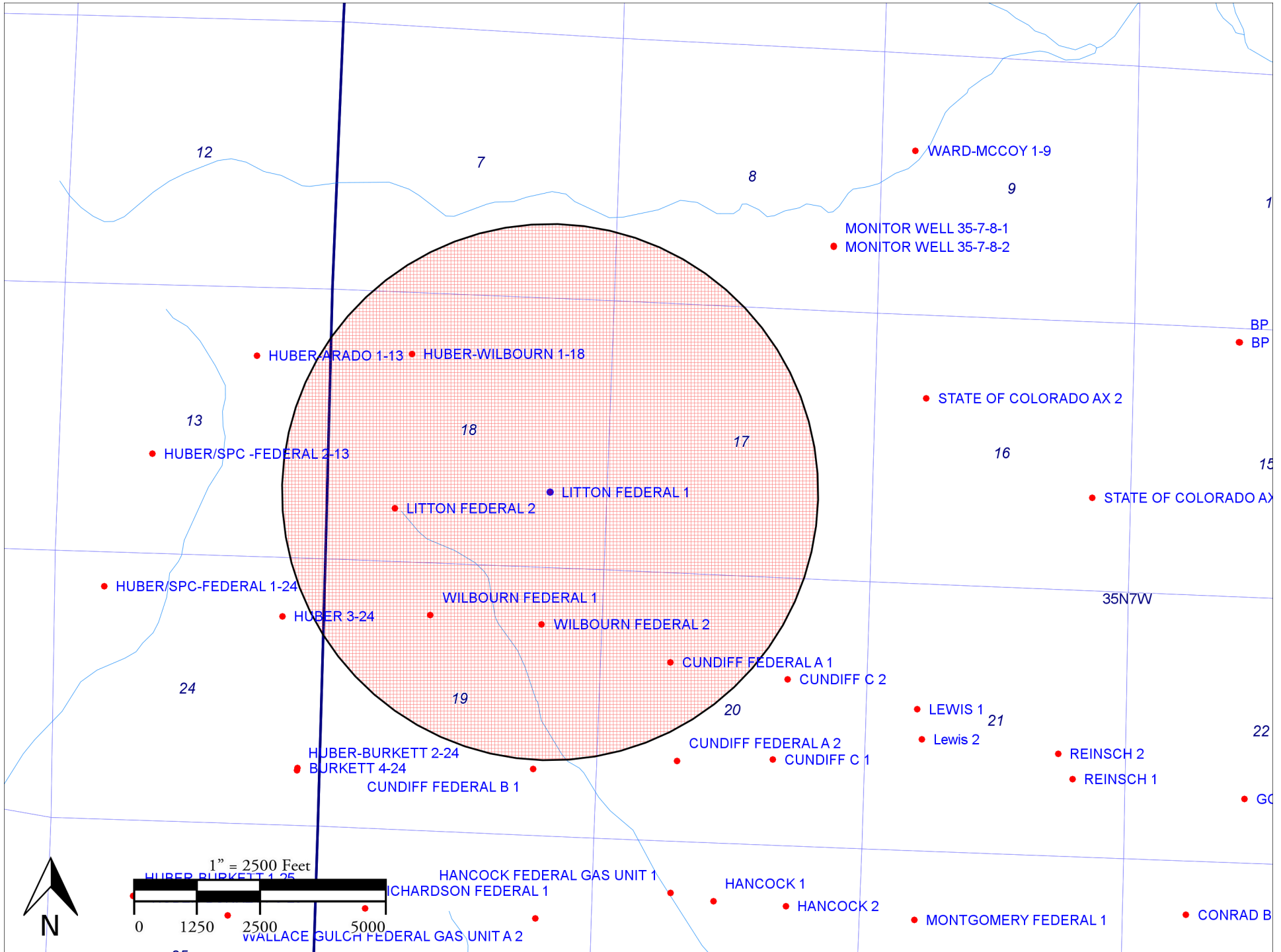


Admin

# Litton Federal 1 sensitive wildlife area map



# Litton Federal 1 water resources map



## Condition of Reclamation Photographs

Picture .1. Well pad overview facing north.





Picture .2. Well pad overview facing south.



Picture .3. Well pad overview facing east.





Picture .3. Well pad overview facing west.





BP L48 San Juan



## V2 Compliance Follow Up Form

18144421362

<b>Reference Number:</b>	20200605-18144421362
<b>Form Name:</b>	V2 Compliance Follow Up Form
<b>Submitter Name:</b>	Cole Nichols (colen@horizonenvservices.com)   colen@horizonenvservices.com
<b>Submission Date:</b>	Jun 5, 2020 9:57:23 AM MDT
<b>Location:</b>	557 Airpark Dr, Durango, CO 81303, USA Jun 5, 2020 9:57:11 AM MDT [ <a href="#">View Map</a> ]

## INFORMATION

### Section 1

<b>Name</b>	colen@horizonenvservices.com
<b>Date</b>	Jun 3, 2020
<b>Well Name</b>	LITTON FEDERAL GAS UNIT 1
<b>API Number</b>	50670720500
<b>Select State</b>	Colorado
<b>Work type</b>	Plug & Abandonment Work
<b>Action Complete</b>	Clean Up Weed Debris
<b>Photo of first corrective action completed</b>	



**Completed work description Corrective location**  
**Action 1**  
**Photo of second corrective action completed**



**Completed work description of corrective action 2**

treated cheatgrass areas

**Photo of third corrective action completed**



**Completed work description of corrective action 3**

treated cheatgrass areas

**Photo of fourth corrective action completed**



**Completed work description**

location

**Completed work description of corrective action 4**

removed cheatgrass and treated site

**Additional photos**



**Completed work description**

removed cheatgrass and treated cheatgrass areas

**Summary of all work completed**

previous treatment dates 7/13/16, reclamation

# 502.b Formal Director Variance Approval

## Site-Specific Final Reclamation Plan

BP America

### I. General Location Description:

API/Facility ID 05-067-07205		Well Number: 1	
Well Number:	Well Name:	Location	Field Name/Field No.
1	Litton Federal #1	T35N-7W R W Sec. 18:	IGNACIO BLANCO - #38300

### Related Facilities

Search Results - 2 record(s) returned.						
Facility Type	Facility ID/ API	Facility Name/ Number	Operator Name/ Number	Status	Field Name/ Number	Location
<a href="#">WELL</a>	05-067-07205	LITTON FEDERAL 1	BP AMERICA PRODUCTION COMPANY 10000	PR 2/1/2011	IGNACIO BLANCO 38300	LA PLATA 067/34 NESE 18 35N 7W
<a href="#">LOCATION</a>	325941	LITTON FEDERAL GAS UNIT-N35N7W 18NESE	BP AMERICA PRODUCTION COMPANY 10000	AC 2/1/2011	IGNACIO BLANCO 38300	LA PLATA 067/34 NESE 18 35N 7W

There are no other wells on this location.

### II Overview:

This "Site-Specific Final Reclamation Plan" document attempts to both provide a detailed description of the reclamation plan for this location and to follow the "Rule 1001.c Reclamation Variances and Waivers" guidance document dated December 17, 2015. The information in this document aligns with the requirements in the guidance document.

### III Reclamation Plan

#### Details

#### Well Pad

#### Location

The annotated polygon on the aerial image (see **Image A** below) is the approximate, total disturbed surface area before reclamation work was completed. The total disturbed surface area of the **Litton Federal #1** well pad for BP America operations was approximately 0.93 acres (less than 1 acre).

**Pipeline**

The Litton Federal 1 well had a 3 inch gas line and a 3 inch water line that is run from the north west edge of well pad across the surface owners grazing field to the south and ties into the pipeline at the Wilbourn Federal GU 2. Both of these pipelines have been abandoned in place per the surface owner not to disturb the grazing pasture vegetation. The original length of the pipeline was approximately 3,467 feet. The lines were cut were marked on image C below. Both ends of both lines were then filled greater than 2 feet on each end with K-Krete flowable fill and a cap was cemented on each end as well. The line near the tie-in at the Wilbourn Federal 2 valve set was cut 4 feet from the active lines which were flanged in accordance with ANSI guidelines.

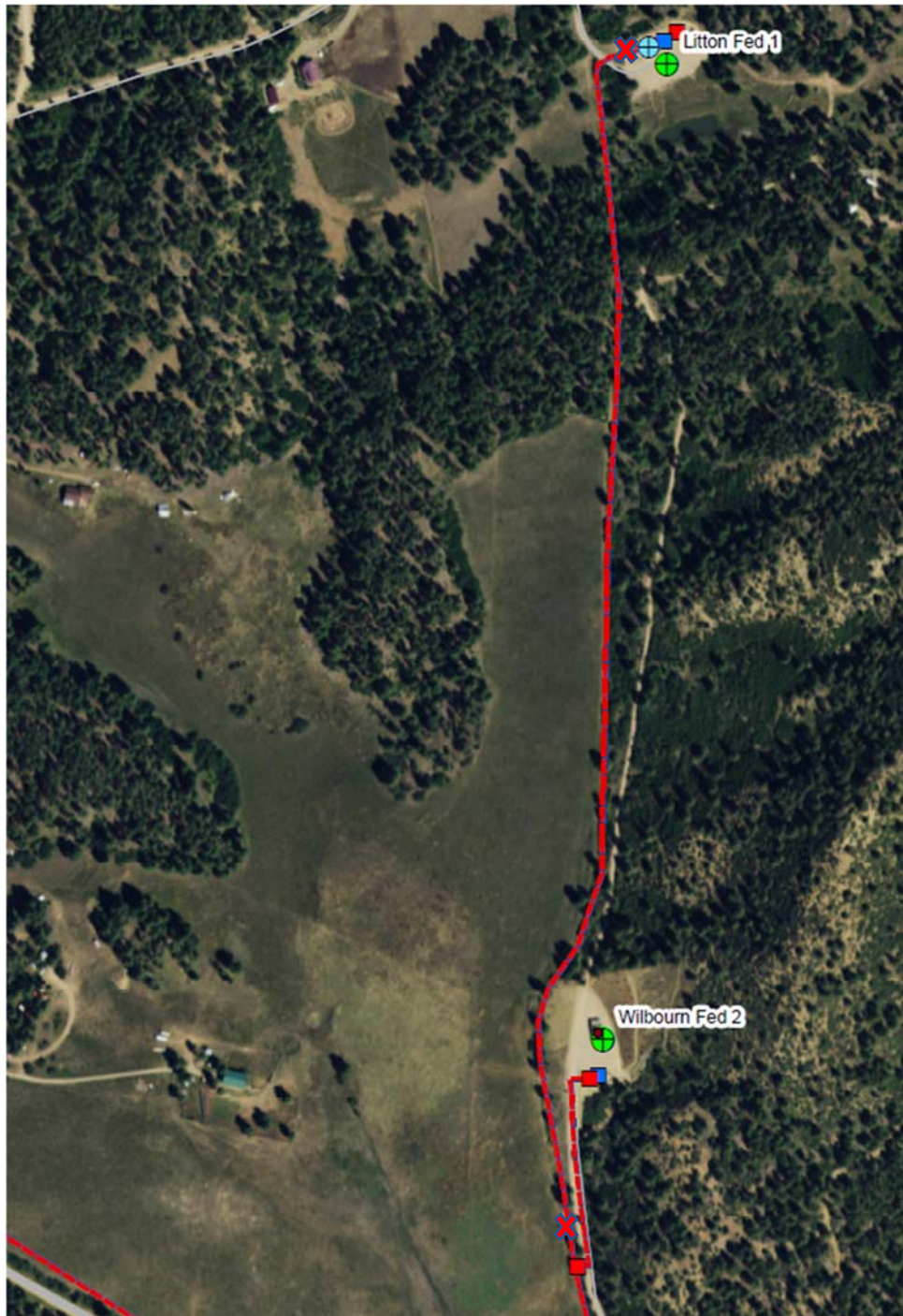
**Image A**



**Image B**



Image C



The surface owner requested during the final reclamation consultation and has entered into an agreement with BP America concerning these specified reclamation plans; that the well should not be returned to contour; that the well pad remain flat; that the gravel should not be removed from the flat portions of the well pad; BP America will leave all disturbed areas compacted, stabilized and covered with gravel that will remain in place to minimize new soil disturbance and minimize soil erosion. The well pad will be utilized long term by the surface owner as a hay storage and cattle/horse pen area with parking for trucks, stock trailers and recreational vehicles. This property is utilized for recreational hunting by family and friends of the surface owner. The property is also used by the adjacent neighbor for grazing therefore this pad will serve as a gathering and loading area for cattle.

In order to fulfill the surface owner's requests concerning final reclamation BP America is seeking a variance for the below specified portions of the well pad from select requirements in Rule 1004.(a): Rule 1004.a;

**1) Sentence 3 – “All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured.”**

Access road shown in image B above will remain fully compacted with gravel to serve as a secondary entrance/exit to the surface owners property in the event of wild land fires. This access road will also serve as access to the well pad that will serve in the future an agricultural and recreational purpose for grazing lease and family and friends during hunting season.

**2) Sentence 5 – “Well locations, access roads and associated facilities shall be reclaimed.”**

Well location will remain flat with gravel to serve in an agricultural and recreational capacity. The well pad will be utilized for a hay storage building in the north western portion of the well pad and corrals/pens in the north eastern portion of the pad. The southern portion of the well pad will be utilized as turn around and parking for trucks, stock trailers and recreational vehicles during hunting season or times of livestock gathering.

**3) Sentence 6 – “As applicable, compaction alleviation, restoration, and re-vegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003.”**

The road and well pad per surface owner request will be left fully compacted for vehicle use and agricultural storage and use. The P&A marker has been placed below grade per approved sundry to avoid any vehicular accidents that could occur with a standard above grade marker. The interim reclamation area of this well pad has established, mature vegetation that will remain in place ensuring the stabilization of the edge of the well pad and filtration/infiltration of any storm water flowing off the southern portion of the well pad.

**and Rule 1004.c.(2);**

**4) Sentence (1) – On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal.**

Since the surface owner has requested that the gravel be left on the well pad the vegetative growth will not likely reach a total percent plant cover of eighty percent (80%) of pre-disturbance or reference area levels; therefore, a variance from rule 1004.c.(2) has been requested as a requirement for achieving successful final reclamation thresholds for release of financial assurance.

BP America has performed all other specified requirements in 1004.(a) on the LITTON FEDERAL #1 location including;

- **Sentence 1 – “All pits, mouse and rat holes and cellars shall be backfilled.”**

Pit was closed out and reclaimed during drilling completion operations

Cellar was not present around well head. Cellar around water transfer equipment has been completely removed.

- **Sentence 2 – “All debris, abandoned gathering line risers and flowline risers [if existed] have been removed.”**

All operator debris has been removed from location.

All gathering line risers and flow line risers in existence have been permanently removed from location.

- **Sentence 2 – Guy line anchors and guy liner anchor markers have been removed.**

Rig anchors have been physically removed from location

- **Sentence 7 – “All other equipment, supplies, weeds, rubbish, and other waste materials that existed on location have been removed.”**

No noxious weeds have been identified on the well pad or in the interim reclamation area.

All waste materials, trash and debris has been removed from the area. It should be noted that prior to plugging of the well and during the walk down meeting with the surface owner a cattle guard was identified to the east of the well pad. This cattle guard is the personal property of the land owner and not oil and gas operator unused equipment or debris.

Additionally, BP America has performed the following reclamation work on the well pad to achieve successful reclamation on the location and to a condition satisfactory to the surface owner.

- Stormwater BMPs were constructed and maintained to achieve site stabilization.
- Drainage features were constructed along north side of well pad to allow drainage around the pad preventing storm water runoff from the hill coming onto the well pad.
- The perimeter of the pad was contoured to divert runoff from the face of the sloped areas to prevent and reduce erosion.
- BP America has performed additional seeding on the interim reclamation as needed for bare spots present at the time of reclamation work.

After all reclamation has been completed, disturbed surface of the “Waiver Area” for the well pad is approximately 0.9 acres . BP America left some disturbed areas compacted, stabilized and covered with gravel that will remain in place to minimize new soil disturbance and minimize soil erosion.

### **Access Road ROW**

The annotated polygon on the aerial image (see **Image D** below) is the approximate, disturbed surface area before reclamation work was completed. The disturbed area of the LITTON FEDERAL #1 access road for BP America operations was approximately 0.28 acres (less than 1 acre).

The surface owner requested during the Final Reclamation Consultation and has entered into an agreement with BP America concerning these specified reclamation plans; that the Right-of-Way (access road) should not be returned to contour; that the Right-of-Way (access road) remain flat; that the gravel should not be removed from the Right-of-Way (access road).

**In order to fulfill the surface owner's requests concerning final reclamation, BP America is seeking a variance for the specified below portions of the Right-of-Way (access road) from select requirements in Rule 1004.(a):**

**5.) Sentence 3 – “All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured.”**

Access road shown in image B above will remain fully compacted with gravel to serve as a secondary entrance/exit to the surface owners property in the event of wild land fires. This access road will also serve as access to the well pad that will serve in the future an agricultural and recreational purpose for grazing lease and family and friends during hunting season.

**6.) Sentence 5 – “Well locations, access roads and associated facilities shall be reclaimed.**

Well location will remain flat with gravel to serve in an agricultural and recreational capacity. The well pad will be utilized for a hay storage building in the north western portion of the well pad and corrals/pens in the north eastern portion of the pad. The southern portion of the well pad will be utilized as turn around and parking for trucks, stock trailers and recreational vehicles during hunting season or times of livestock gathering.

**7.) Sentence 6 – “As applicable, compaction alleviation, restoration, and re-vegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003.**

The road and well pad per surface owner request will be left fully compacted for vehicle use and agricultural storage and use. The P&A marker has been placed below grade per approved sundry to avoid any vehicular accidents that could occur with a standard above grade marker. The interim reclamation area of this well pad has established, mature vegetation that will remain in place ensuring the stabilization of the edge of the well pad and filtration/infiltration of any storm water flowing off the southern portion of the well pad.

**and Rule 1004.c (2);**

**8.) Sentence 1 – “On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-**

**disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal.”**

Since the surface owner has requested that the gravel be left on the Right-of-Way (access road) the vegetative growth will not likely reach a total percent plant cover of eighty percent (80%) of pre-disturbance or reference area levels due to continued use for reclamation by the surface owner and/or grazing leasee; therefore, a variance from rule 1004.c.(2) has been requested to waive this requirement for achieving successful final reclamation thresholds for release of financial assurance.

BP America performed the following reclamation work on the Right-of-Way (access road) to achieve successful reclamation on the location and to a condition satisfactory to the Surface Owner:

- Stormwater BMPs were constructed / maintained to achieve site stabilization.

After all reclamation has been completed, disturbed surface of the “Waiver Area” for the ROW (access road) is approximately 0.28 acres (See **Image E** below).

Image D



Image E



Document Number:  
401129181

Date Received:  
10/13/2016

**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: 10000 Contact Name: Patti Campbell

Name of Operator: BP AMERICA PRODUCTION COMPANY Phone: (970) 335-3828

Address: 380 AIRPORT RD Fax: \_\_\_\_\_

City: DURANGO State: CO Zip: 81303 Email: patricia.campbell@bp.com

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

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

API Number 05-067-07205-00

Well Name: LITTON FEDERAL Well Number: 1

Location: QtrQtr: NESE Section: 18 Township: 35N Range: 7W Meridian: N

County: LA PLATA Federal, Indian or State Lease Number: 18055

Field Name: IGNACIO BLANCO Field Number: 38300

Notice of Intent to Abandon       Subsequent Report of Abandonment

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

Latitude: 37.298761 Longitude: -107.672056

GPS Data:  
Date of Measurement: 03/31/2005 PDOP Reading: 5.6 GPS Instrument Operator's Name: David Rogers -

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
FRUITLAND COAL	1698	1840	10/03/2016	B PLUG CEMENT TOP	1775

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	265	200	265	0	
1ST	7+7/8	5+1/2	17	2,059	490	2,065		

## Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 1775 with 23 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 64 sks cmt from 1417 ft. to 620 ft. Plug Type: CASING Plug Tagged:   
Set 44 sks cmt from 320 ft. to 0 ft. Plug Type: CASING Plug Tagged:   
Set 0 sks cmt from 0 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:   
Perforate and squeeze at 1647 ft. with 35 sacks. Leave at least 100 ft. in casing 1647 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 20 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 0 sacks in mouse hole

### Additional Plugging Information for Subsequent Report Only

Casing Recovered: \_\_\_\_\_ ft. \_\_\_\_\_ inch casing Plugging Date: 10/03/2016  
of \_\_\_\_\_  
\*Wireline Contractor: A Plus \*Cementing Contractor: A Plus  
Type of Cement and Additives Used: Class B  
Flowline/Pipeline has been abandoned per Rule 1103  Yes  No \*ATTACH JOB SUMMARY

#### Technical Detail/Comments:

Set 4.5 CIBP at 1,775', set CR at 1,647'  
Tested casing at 800 psi for 30 minutes. Passed.  
Plug 1: Pumped 35 sxs of Class B cement; 23 sxs below CR and 12 sxs above CR. Tagged TOC at 1,542'.  
Plug 2: Set a balanced plug with 64 sxs of Class B cement from 1,417'-620'. Tagged TOC at 620'.  
Plug 3: Set a balanced plug with 44 sxs of Class B cement from 350' to 0'. Tagged TOC in casing at 15' and 75' in annulus. Topped off with 20 sxs. Circulated to surface.

Set PA marker on 10/3/16.

A Plus will provide the 3rd party cement reports directly to the COGCC.

Please see attached wellbore diagram.

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

Signed: \_\_\_\_\_ Print Name: Patti Campbell  
Title: Regulatory Analyst Date: 10/13/2016 Email: patricia.campbell@bp.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: Murray, Richard Date: 4/2/2018

CONDITIONS OF APPROVAL, IF ANY: \_\_\_\_\_

<b>COA Type</b>	<b>Description</b>

**Attachment Check List**

<b>Att Doc Num</b>	<b>Name</b>
901618	CEMENT JOB SUMMARY
401129181	FORM 6 SUBSEQUENT SUBMITTED
401129686	WELLBORE DIAGRAM

Total Attach: 3 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Engineering Tech	Corrected casing plug to CICR Corrected sacks to surface	04/02/2018
Permit	Operator submitted cement ticket.	08/29/2017
Permit	Waiting on 3rd party cement tickets.	10/13/2016

Total: 3 comment(s)

**State of Colorado  
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: <b>401156167</b>			
Date Received: <b>11/28/2016</b>			

**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: 10000 Contact Name Sabre Beebe  
 Name of Operator: BP AMERICA PRODUCTION COMPANY Phone: (970) 375-7530  
 Address: 380 AIRPORT RD Fax: ( )  
 City: DURANGO State: CO Zip: 81303 Email: sabre.beebe@bp.com

Complete the Attachment  
Checklist

OP OGCC

API Number : 05- 067 07205 00 OGCC Facility ID Number: 215600  
 Well/Facility Name: LITTON FEDERAL Well/Facility Number: 1  
 Location QtrQtr: NESE Section: 18 Township: 35N Range: 7W Meridian: N  
 County: LA PLATA Field Name: IGNACIO BLANCO  
 Federal, Indian or State Lease Number: 18055

Survey Plat		
Directional Survey		
Srfc 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 NESE Sec 18

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>1650</u>	<u>FSL</u>	<u>1070</u>	<u>FEL</u>
_____	_____	_____	_____
Twp <u>35N</u>	Range <u>7W</u>	Meridian <u>N</u>	
Twp _____	Range _____	Meridian _____	
_____	_____	_____	_____
_____	_____	_____	_____
Twp _____	Range _____		
Twp _____	Range _____		
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

\*\*

\*\*

\*\* attach deviated drilling plan



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 12/19/2016

REPORT OF WORK DONE Date Work Completed \_\_\_\_\_

<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 type="checkbox"/> Rule 502 variance requested. Must provide detailed info regarding request.	
<input checked="" type="checkbox"/> Other <u>Chg to subsurface PA</u>	<input type="checkbox"/> Status Update/Change of Remediation Plans for Spills and Releases	

COMMENTS:

Surface owner requested post plug and abandonment of well bore that the P&A marker which is above grade be replaced with a subsurface P&A marker. This work will commence as soon as possible. GPS ball marker will be placed at marker point and GPS during marker exchange.

**CASING AND CEMENTING CHANGES**

Casing Type	Size	Of	/	Hole	Size	Of	/	Casing	Wt/Ft	Csg/LinTop	Setting Depth	Sacks of Cement	Cement Bottom	Cement Top

**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**

--	--

Operator Comments:

Longitude -107.672096  
Latitude 37.298801  
BP completed plug and abandonment on October 3, 2016. BP is requesting to replace current above grade P&A marker with below grade P&A marker during equipment stripping of location to comply with Landowner request.

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

Signed: \_\_\_\_\_ Print Name: Sabre Beebe  
Title: Compliance Specialist Email: sabre.beebe@bp.com Date: 11/28/2016

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

COGCC Approved: WEEMS, MARK Date: 12/9/2016

### CONDITIONS OF APPROVAL, IF ANY:

**COA Type**

**Description**

--	--

### General Comments

**User Group**

**Comment**

**Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)

### Attachment Check List

**Att Doc Num**

**Name**

401156167	FORM 4 SUBMITTED
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Total Attach: 1 Files