



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

Location Name: E. Johnson-65N67W 2NENW

Location ID: 331761

Well Name: E. Johnson 2-21

API #: 05-123-21260

Prepared for:
PDC Energy Inc.

Prepared by:
Duraroot, LLC

Date:
January 2021



January 31, 2021

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
Location: E. Johnson-65N67W 2NENW **Location ID: 331761**
Well Name: E. Johnson 2-21 **API #: 05-123-21260**
Section 2: NENW, Township 5 North, Range 67 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 E. Johnson 2-21 access road. PDC has plugged and abandoned (P&A) the former E. Johnson 2-21 well in accordance with the requirements of Rule 1004.a. (Form 6 Subsequent Document Number: 402427034).

Furthermore, in accordance with the surface owner's request (see Attachment A), PDC has left the associated access road in place. The surface owner(s) Shur View LTD Partnership (Ms. Sandra K Wortley) has requested that PDC not remove/ reclaim the former E. Johnson 2-21 access road. The surface owner(s) wishes to waive reclamation on the former access road because the surface owner(s) uses the former access road to monitor for trespassers on the surface owner's property.

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 E. Johnson 2-21 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), Shur View LTD Partnership (Ms. Sandra K Wortley), regarding the location's final reclamation efforts and the request to leave the former access road 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, CEM

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

Attachments:

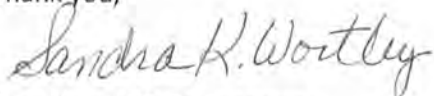
Attachment A: Executed Final Reclamation Agreement
Attachment B: Operator Demonstration
Exhibit A: Facility Photos and Aerial Imagery
Exhibit B: Well Abandonment - Subsequent Form 6

Attachment A:
Executed Final Reclamation Agreement

To Whom It May Concern at the COGCC;

I, Sandra K Wortley (Shur View LTD Partnership), owner of parcel 095702000004 Sec 2, T5N, R67W, in Weld County, Colorado, have requested PDC Energy not reclaim the access road to the now Plugged and Abandoned E. Johnson 2-21 and 2-22 wells. We use these roads to access our property and other roads to monitor trespassers and illegal hunters.

Thank you,

A handwritten signature in cursive script that reads "Sandra K. Wortley".

Shur View LTD Partnership
Sandra K Wortley
P.O. Box 62623
Colorado Springs, Colorado 80962



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

May 12, 2020

Shur View LTD Partnership
P.O. Box 62623
Colorado Springs, Colorado 80962

Re: **Final Reclamation Agreement**
API# 05-123-21260, 21265 E. Johnson 2-21, 2-22
Township 5 North, Range 67 West, 6th P.M.
Section 2: NW/4
Weld County, Colorado

Dear Shur View LTD Partnership (the "Surface Owner"):

PDC Energy, Inc. ("PDC") has previously consulted with you concerning the final reclamation of the above-captioned well(s) in accordance with your direction concerning future use of the land and applicable rules of the Colorado Oil and Gas Conservation Commission ("COGCC"). The well(s) were plugged and abandoned and PDC has removed all associated production facility equipment from the site(s). Pursuant to COGCC Rule 1001.c, PDC and the Surface Owner, agree to enter into this Final Reclamation Agreement in order 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:

- Access road to the former wellheads.

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:

- The access roads are used by the Surface Owner to monitor for trespassers on their property.

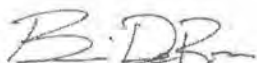
As the Surface Owner, you acknowledge that the current condition of the property subject to this Final Reclamation Agreement is satisfactory to you. If applicable, you acknowledge responsibility of topsoil protection. Additionally, by executing this letter below, as the Surface Owner, you also acknowledge 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.

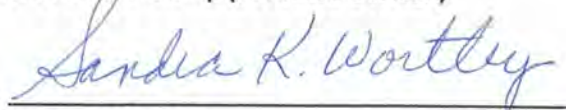
Respectfully,



Brian DeRose
Surface Land Supervisor

I acknowledge and agree as set forth above.

Shur View LTD Partnership (SURFACE OWNER)

Signed: 

Sandra K Wortley

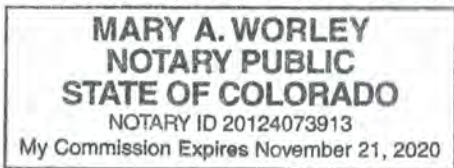
Date: 5/21/2020

ACKNOWLEDGEMENTS

State of Colorado)
County of ~~Weld~~ El Paso) §

On this 21 day of May, 2020, before me personally appeared Sandra K Wortley, 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)



My commission expires: 11-21-2020

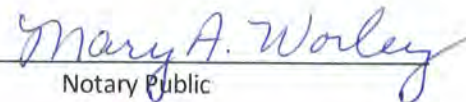

Notary Public

Exhibit A

Shur View LTD Partnership
P.O. Box 62623
Colorado Springs, Colorado 80962

Final Reclamation Agreement

API# 05-123-21260, 21265 E. Johnson 2-21, 2-22
Township 5 North, Range 67 West, 6th P.M.
Section 2: NW/4
Weld County, Colorado



Attachment B:
Operator Demonstration

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) Shur View LTD Partnership (Ms. Sandra K Wortley) on May 21, 2020, for the former E. Johnson 2-21 access road 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(s) (see Attachment A). The surface owner(s) requested that PDC not remove/ reclaim the former E. Johnson 2-21 access road. The disturbance area for the former E. Johnson 2-21 access road is approximately 0.45 acre (0.25 mile). The surface owner(s) wishes to waive reclamation on the former access road because the surface owner(s) uses the former access roads to monitor for trespassers on the surface owner’s property.

P&A for the E. Johnson 2-21 well was finalized on May 19, 2020. All associated wellhead equipment has been removed. Exhibit A consists of facility photos taken on December 4, 2020, that demonstrate the existing state of reclamation on the former E. Johnson 2-21 location.

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

The former E. Johnson 2-21 well has been P&A and reclaimed in accordance with Rule 1004. The former E. Johnson 2-21 location is approximately 1.0 mile north of County Road 257 along Missile Park Road, approximately 0.50 mile west of U.S. Hwy 34, and approximately 3.5 miles southeast of Windsor, Colorado. The former access road surface is compacted and graveled 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 December 4, 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 E. Johnson 2-21 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 former E. Johnson 2-21 location is approximately 1.0 mile north of County Road 257 along Missile Park Road, approximately 0.50 mile west of U.S. Hwy 34, and approximately 3.5 miles southeast of Windsor, Colorado. The former E. Johnson 2-21 well has been P&A and reclaimed in accordance with Rule 1004 (see Exhibits A and B).

Public Welfare Analysis

The specified final reclamation variance request from Rule 1004 is a minor request that maintains the protection of public welfare. The E. Johnson 2-21 location is on private property and the access road will be used by the surface owner(s) to access and maintain their property. 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 E. Johnson 2-21 location does not fall within a Rule 317B Public Water System Protection area, according to the COGCC GIS “PWS 317B” mapping layer. The former E. Johnson 2-21 location is approximately 1,429 feet southeast of the nearest surface water (Unnamed Pond) according to several COGCC GIS “Water Resources” mapping layers (Figure 1). Due to the nature of this variance the former E. Johnson 2-21 location does not pose a risk to surface water.



Figure 1. Distance to nearest surface water feature for the former E. Johnson 2-21 location.

The former E. Johnson 2-21 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).

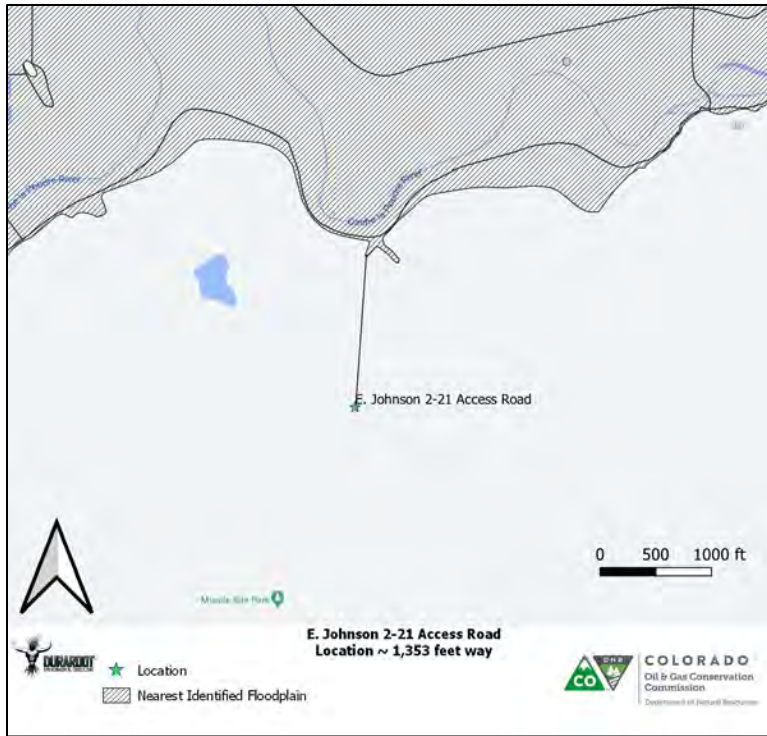


Figure 2. Distance to nearest 100-Year Floodplain for the former E. Johnson 2-21 location.

The former E. Johnson 2-21 location is approximately 3,613 feet southwest 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 E. Johnson 2-21 location.

Wildlife

The former E. Johnson 2-21 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 1.5 miles to the northeast.



Figure 4. Distance to nearest Restricted Surface Occupancy (RSO) or Sensitive Wildlife Habitat (SWH) for the former E. Johnson 2-21 location.

Based on this evaluation it has been established that:

- given the small size of the variance request (0.45 acre - 0.25 mile),
- 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 E. Johnson 2-21 location would have NO NEGATIVE IMPACTS on public health, public safety, public welfare, environment, or wildlife.

Exhibit A:
Facility Photos and Aerial Imagery

Exhibit A: FACILITY PHOTOS

PREPARED FOR: PDC ENERGY, INC.



Facility:

Facility Type:

Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

Date Prepared:

Exhibit A: FACILITY PHOTOS

PREPARED FOR: PDC ENERGY, INC.



Facility:

Facility Type:

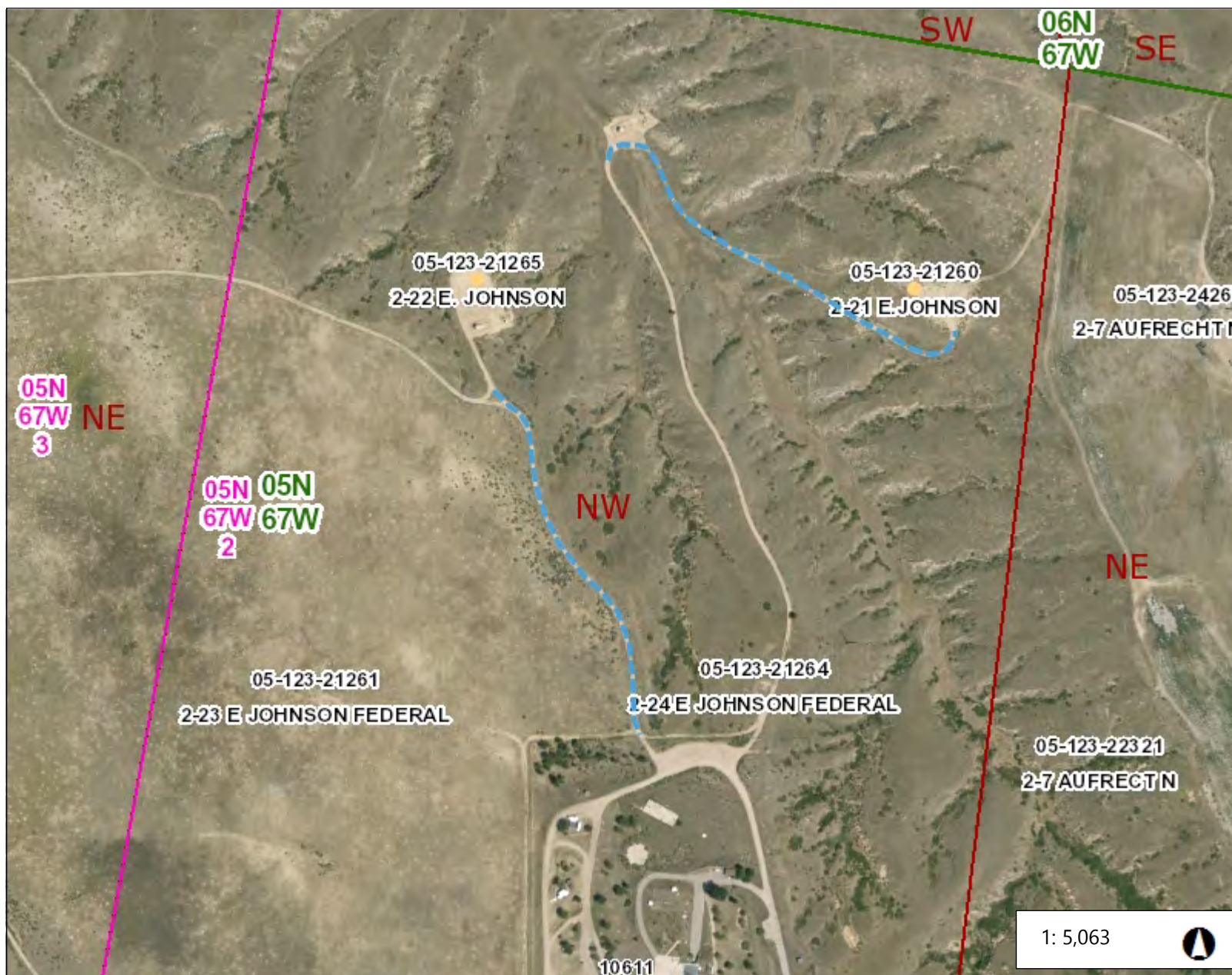
Legal Description:

Date of Assessment:

COGCC Location ID#:

County:

Date Prepared:



Legend

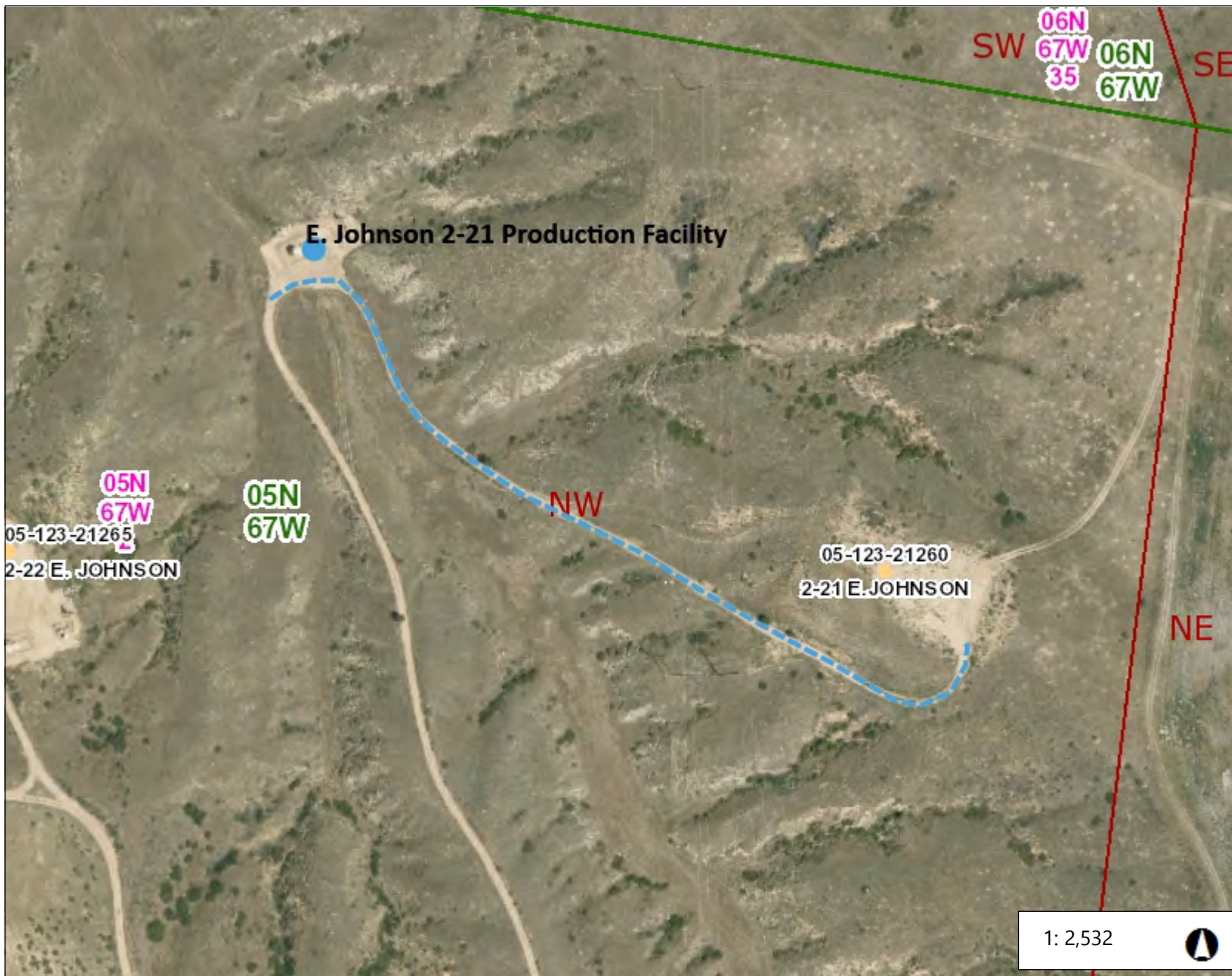
- API Label
- Well Name Label
- ▲ Weld Oil and Gas Location As
- Oil and Gas Wells - Active
 - Producing
 - Permit
 - Drilling
 - Injection
 - Shut-In
 - Temporarily Abandoned
 - Waiting on Completion
 - Gas Storage / Monitoring
- Highway
- Township / Range
- Section
- Quarter Section
- County Boundary

1: 5,063



843.9 0 421.94 843.9 Feet

Notes



Legend

- Floodplain - 500 Year
- Floodplain - 100 Year Zone A
- Floodplain - 100 Year Zone AE
- Floodplain - 100 Year Floodwa
- Floodplain - 100 Year Zone A1
- Floodplain - 100 Year Zone AC
- 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

Notes

421.9 0 210.97 421.9 Feet

Exhibit B:

Well Abandonment – Subsequent Form 6

Document Number:
402427034

Date Received:
06/20/2020

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: Valerie Danson
 Name of Operator: PDC ENERGY INC Phone: (970) 506-9272
 Address: 1775 SHERMAN STREET - STE 3000 Fax: _____
 City: DENVER State: CO Zip: 80203 Email: valerie.danson@pdce.com

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

COGCC contact: _____

Type of Well Abandonment Report: Notice of Intent to Abandon Subsequent Report of Abandonment

API Number 05-123-21260-00
 Well Name: E.JOHNSON Well Number: 2-21
 Location: QtrQtr: NENW Section: 2 Township: 5N Range: 67W Meridian: 6
 County: WELD Federal, Indian or State Lease Number: _____
 Field Name: WATTENBERG Field Number: 90750

Only Complete the Following Background Information for Intent to Abandon

Latitude: 40.434810 Longitude: -104.859610
 GPS Data: GPS Quality Value: 2.2 Type of GPS Quality Value: _____ Date of Measurement: 05/26/2007
 GPS Instrument Operator's Name: Holly L. Tracy
 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
NIOBRARA-CODELL	6840	7140	09/18/2019	B PLUG CEMENT TOP	6780

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	875	615	875	0	VISU
1ST	7+7/8	4+1/2	10.5	7,336	160	7,336	6,430	CBL
S.C. 1.1				6,420	1,445	6,420	0	CBL

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 4503 with 2 sacks cmt on top. CIBP #2: Depth 2550 with 2 sacks cmt on top.
 CIBP #3: Depth _____ with _____ sacks cmt on top. CIBP #4: Depth _____ with _____ sacks cmt on top.
 CIBP #5: Depth _____ with _____ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:
 Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged:

Perforate and squeeze at _____ 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 150 sacks half in. half out surface casing from 1697 ft. to 0 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: _____ ft. _____ inch casing Cut and Cap Date: 05/19/2020
 of _____
 *Wireline Contractor: Ranger Energy Services *Cementing Contractor: NexTier
 Type of Cement and Additives Used: Class G 15.8 PPG Cement
 Flowline/Pipeline has been abandoned per Rule 1105 Yes No

Technical Detail/Comments:

E Johnson 2-21 (05-123-21260)/Plugging Procedure
 Producing Formation: Niobrara/Codell: 6840'-7140'
 Upper Pierre Aquifer: 340'-1580'
 TD: 7343' PBTD: 7281' (9/19/2019)
 Surface Casing: 8 5/8" 24# @ 875' w/ 615 sx cmt
 Production Casing: 4 1/2" 10.5# @ 7336' w/ 160 sx cmt (TOC @ 6430' - CBL)
 Annular Fill @ 6420' w/ 1445 sx cmt (TOC @ surface - CBL)
 Existing CIBP @ 6780' w/ 2 sx cmt (9/18/2019)

Procedure:
 1. MIRU pulling unit. Pull 2 3/8" tubing.
 2. RU wireline company. TIH and tag dump bail of existing CIBP @ 6764'.
 3. TIH with CIBP. Set BP at 4503'. Top with 2 sxs 15.8#/gal CI G cement.
 4. TIH with CIBP. Set BP at 2550'. Top with 2 sxs 15.8#/gal CI G cement.
 5. TIH with tubing to 1697'. RU cementing company. Mix and pump 150 sxs 15.8#/gal CI G cement down tubing. Cement circulate to surface.
 6. 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: Valerie Danson
 Title: Reg Tech Date: 6/20/2020 Email: valerie.danson@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: _____

Date: _____

CONDITIONS OF APPROVAL, IF ANY: _____

<u>COA Type</u>	<u>Description</u>

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402427034	FORM 6 SUBSEQUENT SUBMITTED
402427036	CEMENT JOB SUMMARY
402427037	OPERATIONS SUMMARY
402427038	WELLBORE DIAGRAM

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)