

Abandonment-in-Place Justification

Big Jimmy Unit – Eureka Water Gather 3” and Laterals



Caerus is respectfully requesting approval to abandon-in-place seven (7) flowlines that were previously active and are currently idle in our system (Image 1). This includes roughly 3.47 miles of line 23467 – Eureka 3” Water Gather (formerly part of 6879) and ~1.23 miles that is comprised of six (6) laterals that tie-in to the Eureka 3” Water Gather line. Those laterals and approximate lengths are:

- 6868 – M01 Water {3,080 ft.}
- 6884 – A02 3” Water {404 ft.}
- 6886 – A11 3” Water {990 ft.}
- 6887 – J11 3” Water {1,605 ft.}
- 6889 – M11 3” Water {137.5 ft.}
- 6890 – B15 2” Water {296 ft.}

There is also an inline/future at the F11 pad that will be removed.

Caerus is proposing abandonment-in-place due to the following listed exclusions from removal in the COGCC Regulation 1105.d.

1105.d.2.B: “The line is subject to the jurisdiction of the federal government, and the relevant federal agency directs abandonment in place;”

- Per the BLM *Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development Fourth Edition – Revised 2007*, otherwise known as *The Gold Book*, Chapter 6, “Deeply buried lines may remain in place unless otherwise directed by the authorized officer.”¹
- The depth of the line is on average 4 ft. from surface.

1105.d.2.C.: “The flowline or crude oil transfer line is co-located with other active pipelines or utilities or is in a recorded right of way;”

- The lines in question to be abandoned-in-place are all co-located with active gas pipelines.
- Additional work to remove these lines would increase the risk to impacting the co-located lines.

1105.d.2.D: “Removal of the flowline or crude oil transfer line would cause significant damage to natural resources, including wildlife resources, topsoil, or vegetation;”

- The lines requested for abandonment-in-place have been in place for 13+ years. Significant portions of the right-of-way above the buried pipelines have been heavily re-vegetated.
- Further digging and soil replacement could negatively impact the topsoil quality and should be minimized, limiting the disturbance of the vegetation that has already grown back.

1105.d.2.E: “The flowline or crude oil transfer line is in a restricted surface occupancy area or sensitive wildlife habitat;”

- The lines in question are in what is currently considered “High Priority Habitat” and removal would increase surface disturbance and potential impacts to wildlife.

1105.d.2.F: “The flowline or crude oil transfer line or a segment of the line crosses or is within 30 feet of a public road, railroad, bike path, public right of way, utility corridor or active utility or pipeline crossing;”

¹ [Chapter 6 - Reclamation and Abandonment.pdf \(blm.gov\)](#)

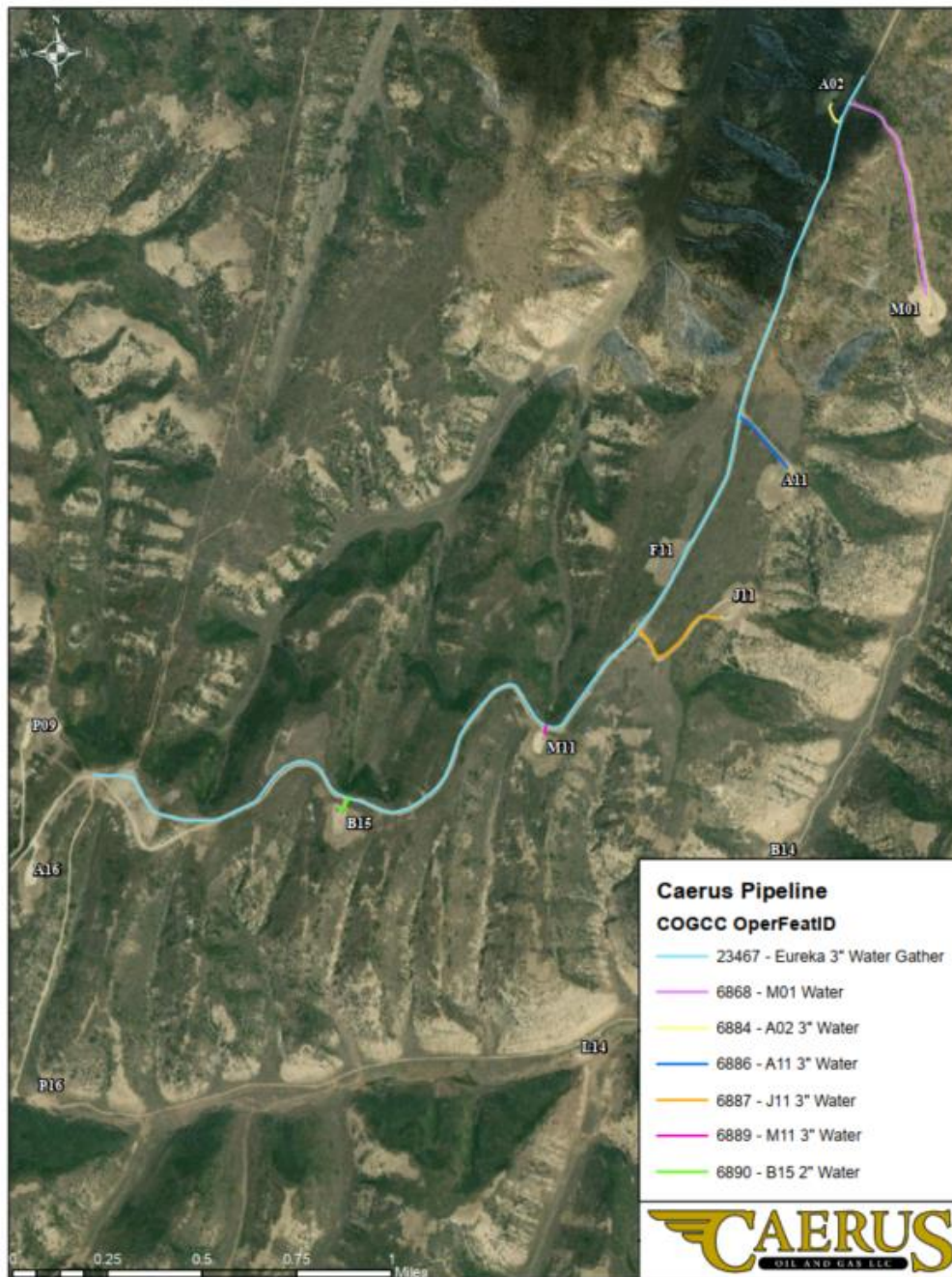
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- The main water gathering line being request for abandonment-in-place is in a right-of-way that runs directly alongside Rio Blanco County Road 69.
- The laterals either cross under County Road 69 or tie-in the main pipeline within 30 feet of the County Road.

Image 1: Proposed lines for Abandonment-in-Place. COGCC OperFeatID listed as the unique identifier.



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Images 2, 3, 4: Enlarged sections of right-of-way (ROW), showing the location of the water line and the re-vegetation along the ROW. Image 4 also shows where the lateral lines reach the main ROW underneath County Road 69.



Image 2



Image 3



Image 4

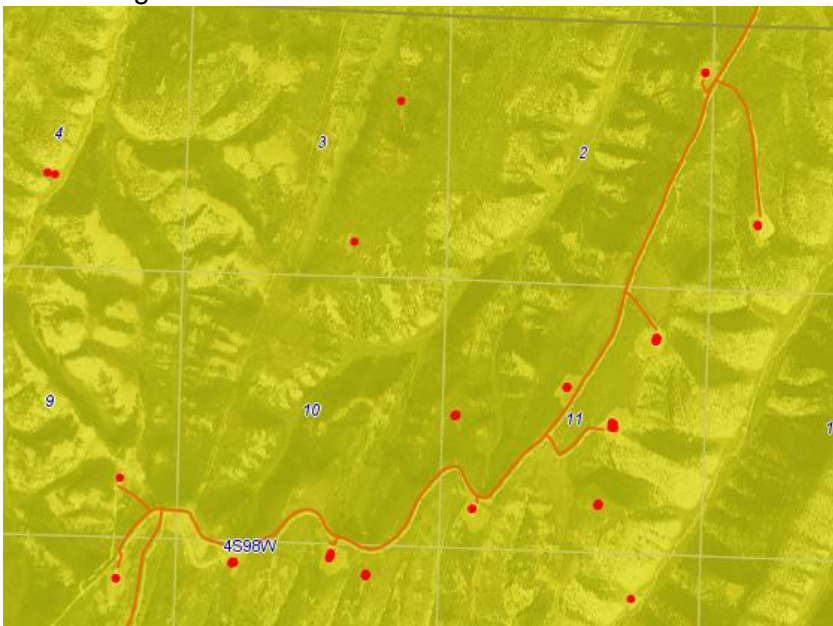
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Image 5: All lines in question for abandonment-in-place as a part of this proposal are co-located with active gas lines along the main corridor and the laterals to location. Safety risks increase by increasing the number of digs along an active gas pipeline.



Image 6: On the COGCC Map Viewer, you can see that the High Priority Habitat is prevalent, and these lines should not be removed. Note: Sensitive Wildlife Habitat and Restricted Surface Occupancy layers are no longer available.



For the reasons listed above, Caerus respectfully requests abandonment-in-place be approved for these seven (7) flowlines. Lines have been blown down and drained by gravity feed. Prior to

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abandonment work, it will be verified that the lines have been evacuated. The line segments will be cut and capped and verified by a third party.