

Abandonment-in-Place Justification

3" Aluminum Liquid Line



Caerus is respectfully requesting approval to abandon-in-place a single flowline that was previously unidentified. After discussions with other line owners in the area, it was determined to belong to Caerus (Image 1). The line does not have a known history of use, however the project will include line evacuation prior to abandonment in place. The line, once identified, was recently submitted for registration under system (477170):

- 25010 –3" Aluminum Liquid (~1.46 mi.)

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 over 4 ft.

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 line 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.
- Image 1

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 line requested for abandonment-in-place has been unused for an extensive period of time. Significant portions of the right-of-way above the buried pipelines have been re-vegetated (Image 2).
- Surface impacts would be on ROW, not nearby road, creating further impacts.
- 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.
- The lines also cross under unnamed drainages (Image 2).

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

- The line in question is in what is currently considered "High Priority Habitat" and removal would increase surface disturbance and potential impacts to wildlife. (Image 3)

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;"

- The main water gathering line being request for abandonment-in-place crosses an existing mapped road that parallels East Willow Creek. (Image 4)

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

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Image 1: Proposed lines for Abandonment-in-Place. The image reflects the blue line as the path of the aluminum line, requested for AIP. This image also shows the co-location of the line with gas pipelines.

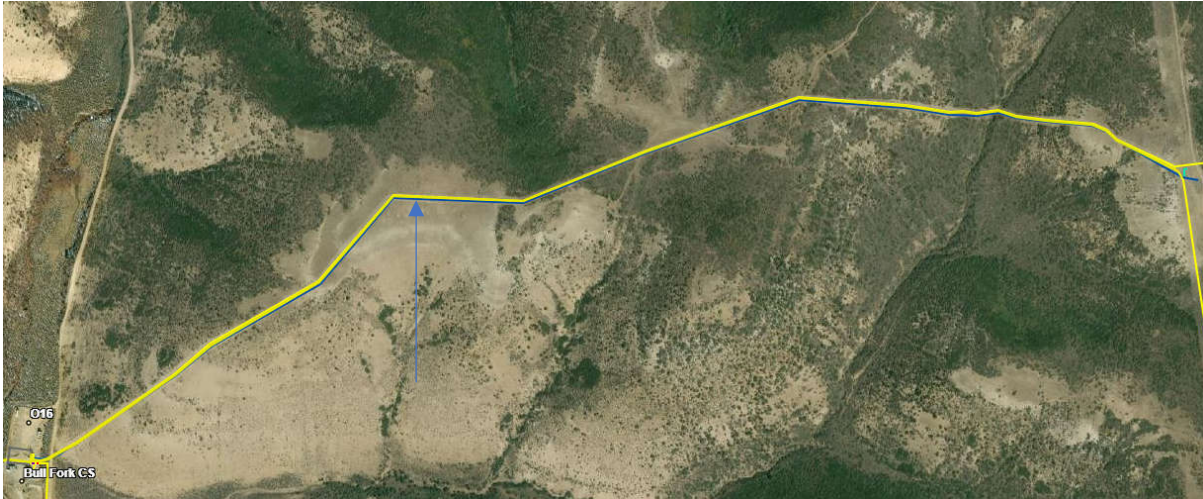


Image 2: Enlarged sections of right-of-way (ROW), showing the location of the water line and the re-vegetation along the ROW. While not fully re-vegetated, there are many sections that are fairly well established in the re-vegetation process. Much of the work would be done on the ROW, not on existing roads, so surficial impact due to removal would be extensive. It also passes under some unmapped drainages.

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line. The flush will take place from the AIP point at the east end tie-in to the Riser at the Bull Fork Compressor station (approx. 7,897' of line). This will be followed by a 3" pig run with an air compressor to dewater the line. We will then pressure test the line to 100 psi for 30 minutes to verify the integrity of the line. Excavation will be down to a minimum of 3 feet cut, where a thread cap will be placed at the ends of the line then encased in concrete. Will have the final AIP points GPS'd, the process will be documented with photographs and third-party verification (per COGCC rules) that the lines were abandoned-in-place per requirements. Backfill and clean-up will follow.