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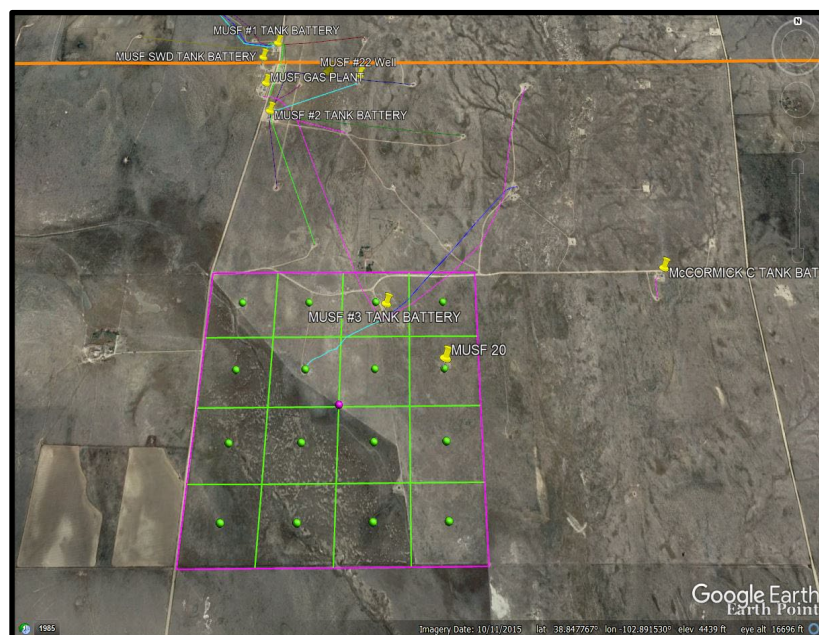
January 18, 2023

Mr. Jason Kosola, P.G.  
Southeast Environmental Protection Specialist  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

**RE: Mull Unit #20**  
**API # 05-017-06274**  
**Location Abandonment and Soils Investigation**  
**Sec 6, Township 14S, Range 49W**  
**Form 27 and Form 44 Submittal**

Mr. Kosola:

Mull Drilling Co., Inc (Mull) is providing this report to the Colorado Oil and Gas Commission (COGCC) for environmental services that will be occurring at Mull Unit #20 in the coming weeks and months. The location in question is the site of an older temporarily abandoned producing well under the original ownership of Citation Petroleum. The well has not been in service for some time Mull intends to mobilize to the site in the coming weeks to finalize the well abandonment process by cutting and capping the original casing at an appropriate depth below grade.



**Site Location**

In following proper abandonment procedures Mull performed an investigation of the flowlines in the area. It was determined that the process line that was attached to the MUSF #20 well was repurposed and is currently being utilized as a gas line which extends from the McCormick C tank battery, ultimately feeding the reinjection plant. As such, it will not be abandoned with the well. However, Mull will be submitting an updated GIS file and flowline integrity file with this submittal since this identification revealed a data gap that needs reconciliation. The line shall be abandoned upon final decommissioning of the entire facility – Sorrento Plant – with the expected consent of the landowner.

Concurrently a soils investigation will occur in order to verify the presence of any soil impacts. A licensed geologist will mobilize to the location and confirm the presence of any soil impacts by taking samples with a photo ionization detector for headspace analysis and by taking soil samples in areas indicative of petroleum impacted locations. All samples shall conform to Table 915-1 analysis: between 5 and 7 samples shall be taken including a background sample and one at depth for ESA purposes. All collected soil samples will be submitted to Pace Laboratories of Kansas for analysis following approved chain of custody protocols.

Please see **Figure 1** for current expected sampling locations. Additions shall be made to these numbers should the onsite geologist determine there is a need to do so.

Any impacted soils determined by exceedances to maximum contaminant levels will be excavated area as required for appropriate removal. Then comparable soils and gravels shall be transported in to recontour any areas as appropriate. All impacted soils will be disposing to Phantom Landfill of Penrose Colorado, EPA #COR000208454 or an appropriate landfill as needed. The lease road to the location will also be removed with landowner notification, the area recontoured to conform to the original landform. Subsequently any areas needing to go through reclamation will undergo that process as required by the state.

Should there be any questions or concerns feel free to contact us,

A handwritten signature in black ink that reads "James Beilman". The signature is written in a cursive, flowing style.

James Beilman, PG, CPG  
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Attachments:

***Figure 1 – Expected Sampling Points***

