

Caerus respectfully requests approval to abandon in place the 4" line 24904 - 44-20 Produced Water Line, which is part of the produced water system: 482203 and the 24753 - YCF 44-20-1 6" GAS LINE TO GATHERING, which is part of the gas gathering system: 470610 (Figure 1).

Work may begin as early as 10/9/23 should the schedule allow; to beat the winter weather season.

Wells on the pad for this lateral will be plugged and abandoned, leaving this line to be unnecessary. Per 1105.d(2), the following items are relevant in support of abandoning the pipe in place:

- B. The line is subject to the jurisdiction of the federal government, and the relevant federal agency directs abandonment in place;
- D. Removal of the flowline or crude oil transfer line would cause significant damage to natural resources, including wildlife resources, topsoil, or vegetation; (Figure 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; (Figure 1, 2)

Further, removal of this line would add truck trips and increased dig time with heavy equipment, leading to increased emissions. The lines requested fall outside of Sensitive Wildlife Habitat, however, threatened plant species exist in the basin, and mapping shows species mapped within ¼ of a mile - Extensive digs for removal could impact vegetation and animal habitat (Figure 3).

Figure 1: Shows line segments for which abandonment in place is being requested. Notice the pipe parallels and is close to a road. Revegetation of ROW has been underway for many years. Further digs for full pipeline removal will impact this vegetation significantly and lead to further degradation of soil quality.



Figure 2: The lines are within 30 feet of an existing access road.



Figure 3: Area map showing threatened plant species. More specifics are limited on public sites to protect the plant communities. However, this area overlaps with the green shaded areas which encompass the threatened plant species.

