



Deranleau - DNR, Greg <greg.deranleau@state.co.us>

RE: PDC-Unioil Form 10

Randall Ferguson <Randall.Ferguson@pdce.com>

Thu, Mar 21, 2013 at 11:00 AM

To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>

Cc: Jim Schaff <Jim.Schaff@pdce.com>, "Adell K. Heneghan" <Adell.Heneghan@pdce.com>, Carrie Ratliff <Carrie.Ratliff@pdce.com>, "Brandon S. Bruns" <Brandon.Bruns@pdce.com>, "Jeffrey M. Glossa" <Jeffrey.Glossa@pdce.com>, "Chesson, Robert" <Robert.Chesson@state.co.us>

Greg:

Thank you for the response regarding the OGLA Form 10 Review Summary and transfer of Unioil to PDC Energy, Inc. As we have previously discussed, Unioil was acquired in 2007 and was a wholly owned subsidiary of Petroleum Development Corp. As you are aware, Petroleum Development Corp. formally changed to PDC Energy, Inc. (PDCE) last year. Attached is the Certificate of Amendment to the Articles of Incorporation dated 6/12/2012 and the Articles of Merger for Unioil to PDCE dated 6/27/2012.

PDC's response to the Action Items is as follows:

Pit Facility #116044 – Please transfer this facility to PDCE. Information was submitted to Bob Chesson on 3/19/13 informing the COGCC that the Unioil Pit Inventory Report from 1995 indicated that the Campion 1 & 2 facility had a 1,400 gallon concrete vault and not a pit. The Campion #1 was P&A'd in 2002 and the Campion #2 was P&A'd in September of 2009. As such, revised Rule 905.b. (effective 4/1/2009) is applicable to the closure of the partially buried produced water vessel at this facility. Therefore, PDC will submit a Form 27 – Site Investigation and Remediation Workplan for the closure of this facility. See attached e-mail from Mr. Chesson dated 3/19/13.

Pit Facility #116103 - Please transfer this facility to PDCE. Information was submitted to Bob Chesson on 3/19/13 informing the COGCC that the Unioil Pit Inventory Report from 1995 indicated that the MacLoughan 25-1 facility had a 1,400 gallon concrete vault and not a pit. The well was P&A'd in July of 2009. As such, revised Rule 905.b. (effective 4/1/2009) is applicable to the closure of the partially buried produced water vessel at this facility. Therefore, PDC will submit a Form 27 – Site Investigation and Remediation Workplan for the closure of this facility. See attached e-mail from Mr. Chesson dated 3/19/13.

Pit Facility #118654 – This facility has been administratively closed by the COGCC. Information was submitted to Bob Chesson on 3/18/13 informing the COGCC that the well was P&A'd in 1991, prior to the submittal of the Pit Inventory Report requirement under Rule 911 and prior to the acquisition of Unioil by Petroleum Development Corp. See attached e-mail from Mr. Chesson dated 3/18/13.

Pit Facility #108126 – This facility has been administratively closed by the COGCC. Information was submitted to Bob Chesson on 3/19/13 informing the COGCC that there was no evidence of a pit at this location. The 12/22/97 COGCC inspection report indicated the presence of a “coffin” or concrete vault. See attached e-mail from Mr. Chesson dated 3/19/13.

Complaint #200114478 – Please administratively resolve this complaint. PDCE is in agreement with the COGCC that this is a duplicate of Complaint #200189842.

Remediation Project #7239 – Please transfer this remediation project to PDCE. Impacted groundwater is currently being monitored on a quarterly basis.

Your assistance in this matter is greatly appreciated. Please call if there are any questions.

Regards,



Randall H. Ferguson

Environmental Compliance Specialist

PDC Energy, Inc.

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Denver, CO 80203

Please Note Email Address Change!

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Cell: (303)570-8575

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]
Sent: Wednesday, March 13, 2013 1:55 PM
To: Randall Ferguson; Jim Schaff
Subject: PDC-Unioil Form 10

Dear Sirs,

COGCC has reviewed the Facilities listed on the Form 10, document number 2544373, and has conducted a database review of files associated with those Facilities and the Selling Operator. Our review indicates that the following action needs to be taken:

1. Pit Facility 116044 requires closure in accordance with Rule 905 and an approved Form 27, please inform *COGCC* if you wish to transfer this facility.
2. Pit Facility 116103 requires closure in accordance with Rule 905 and an approved Form 27, please inform *COGCC* if you wish to transfer this facility.
3. Pit Facility 118654 will be administratively closed by *COGCC* and will not transfer unless requested.
4. Pit Facility 108126 will be given an active status and transferred to PDC.
5. Complaint #200114478 appears to be a duplicate of Complaint #200189842, which has been resolved. *COGCC* will administratively resolve Complaint #20014478.
6. Remediation Project #7239 requires action by the operator in accordance with Form 27 Conditions of Approval. Please inform *COGCC* if you wish to transfer this Remediation Project.

Please see the attached document which summarizes the *COGCC* review. Upon receipt of your direction on the above items, *COGCC* is prepared to approve the Form 10.

Thanks,

—

Greg Deranleau

Oil and Gas Location Supervisor

Colorado Oil and Gas Conservation Commission

303-894-2100 ext. 5153

6 attachments

 **Cetrificate of Amendment_PDCE.pdf**
69K

 **Unioil Merger Document.pdf**
177K

 **noname.eml**
24K

 **noname.eml**
25K

 **noname.eml**
23K

 **noname.eml**
25K