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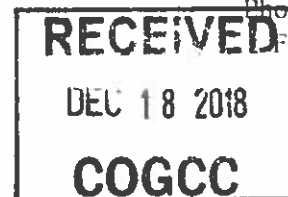
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December 13, 2018

Colorado Oil and Gas Conservation Commission
Attn: Nikki Graber
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: PDC Energy, Inc. Remediation Project No. 11252

Dear Ms. Graber:

As you are aware, the law firm of Grant & Hoffman, P.C. represents Mr. Robert Davenport with regards to the remediation project on his property in Weld County. This letter is to follow up on our phone call from Monday, October 15, 2018, to clarify recent events surrounding this project, and to correct and update the COGCC record.

As an initial matter, Mr. Davenport, through our firm, has retained an independent environmental expert to ensure the techniques employed by PDC's reclamation team will be effective in identifying and removing, if necessary, any contaminants. Finding an expert in this field who fully understood the level of contamination, and what to test for, took longer than anticipated but we did select Dr. Thomas Borch, a professor at Colorado State University.

Second, PDC has asserted that any failures to meet COGCC deadlines for installing monitoring wells is somehow the fault of a lack of responsiveness on our part. While we do not wish to create unnecessary discord, this could not be further from the truth. PDC has set various self-imposed deadlines, and we have met each one. Prior to retaining Dr. Borch, we were in ongoing communication with PDC regarding that effort,¹ and since Dr. Borch was retained, the parties mutually agreed that Dr. Borch and PDC's reclamation expert would communicate directly with regards to the monitoring wells. On September 27, 2018, PDC requested information and approval regarding the proposed monitoring wells and requested a response by end of day September 28. Dr. Borch met this short deadline, however, PDC determined that it could not complete the well installations by the COGCC deadline for installation of the monitoring wells. Well installation commenced on Wednesday, October 17, 2018, and was completed on Friday,

¹ Contrary to PDC's assertions, we sent several updates to PDC's counsel, Mr. Andrew Fiske – including updates on August 29, September 11 and September 20 – regarding the status of our retention of an expert.

October 19. Again, it is not our intention to create any discord, but we feel it is important to note, for the record, that we have been vigilant and timely in coordinating with PDC. Since the well installation in October, samples have been collected and analyzed, and a report was prepared by Tasman Geosciences, Inc. ("Tasman"). In the report there were indications of increased levels of benzene coming from the soil gases around one of the monitoring wells. At this point it is uncertain what is causing the increased levels of benzene gas emissions. PDC has agreed to perform further testing to determine the contaminant responsible for the benzene emissions. Furthermore, samples indicated that the remediation of the contaminated site was not fully successful. Additional testing has been requested to determine the extent of the contamination and to determine the next steps to ensure proper remediation of the contaminated area.

Overall, we are working together with PDC towards a viable solution for the landowner regarding the contamination on his property. But, there is one paragraph in the report prepared by Tasman that we feel needs to be addressed. Under the site-specific evaluation section of the report Tasman states as follows: "Vapor concentrations detected in the monitoring wells are considered low level and do not trigger any immediate risk to human health. It is believed that these concentrations may not be representative of residual source mass, but rather of latent vapors in the well casing and/or of extraneous sources associated with the landowner's business activities."

We take issue with the contention that contamination has resulted from the landowner's business activities. Mr. Davenport's business has been at the property for 2-3 short months. He was intending to move his business to the property and build a new shop where the contaminated site is located, but was forced to abandon those plans because of the contamination. Mr. Davenport's business fabricates and manufactures customized vehicles. There are several vehicles on the property that Mr. Davenport uses in his business. However, the majority of the cars on his property are non-functioning vehicles. Most of the vehicles do not have engines, and those with engines have not had any gasoline or motor oil in the engines for extended periods of time. He uses parts from the non-functioning vehicles to build the customized vehicles for his clients. As an abundance of caution, Mr. Davenport has ordered oil pans to go under all of the vehicles that have engines. Because it would require a significant amount of time for engine oil or gasoline to leak from a car engine and contaminate an area the size of Mr. Davenport's property and vehicles have only been stored there for 2-3 months, coupled with the fact that the vast majority of the vehicles on the property do not have engines, we therefore, deny Tasman's allegation that the contamination was from extraneous sources associated with landowner's use of the property.

We will continue to monitor the situation to ensure proper care is taken in removing the contaminants from Mr. Davenport's property.

If you have any questions or need any additional information from us please feel free to reach out. Our phone number is 970-356-5666 and my email is bhoffman@grantandhoffmanlaw.com.

Sincerely,
GRANT & HOFFMAN. P.C.


Brad L. Hoffman, Esq.