

Thank you for the prompt response Kelly! The typical depth for the flowlines throughout the Unit is between 6 – 8 ft. It is my understanding they were buried this deep to provide ample coverage to protect against freezing during the long winters. Based on the documents you provided this would seem to satisfy the criteria to leave buried in place.

We will forward copies of the NOAV's to you on Monday.

Thanks again Kelly, and hope you are doing well!

Alan

From: Elliott, Kelly A [<mailto:kaelliott@blm.gov>]

Sent: Friday, August 19, 2022 2:12 PM

To: Lily Clark <lclark@kpk.com>; Ray Gorka <rgorka@kpk.com>; Alan Harrison <AHarrison@kpk.com>

Cc: Roberts, James R <j75rober@blm.gov>

Subject: FW: [EXTERNAL] Flowline Removal for P&A Wells

Also, Need to get a copy of the NOAV from either from COGCC or company so we know what rules you are in non-compliance with. Thanks.

From: Elliott, Kelly A

Sent: Friday, August 19, 2022 1:55 PM

To: lclark@kpk.com; rgorka@kpk.com; AHarrison@kpk.com

Cc: Sperandio, Annie M <asperandio@blm.gov>; Roberts, James R <j75rober@blm.gov>; Wyatt Jr, Billy B <bwyatt@blm.gov>; Kay, Ryan M <rmkay@blm.gov>

Subject: RE: [EXTERNAL] Flowline Removal for P&A Wells

Hi Folks, Conditions of Approval for treatment of flowlines, following P&A procedures are noted in the sundry for two wells mentioned below. Hopefully they are far enough below the surface that they can be left in place. Attached are the COAs that discuss further treatment of the flowlines. Please let me know if you have any questions.

Thanks

From: Sperandio, Annie M <asperandio@blm.gov>

Sent: Friday, August 19, 2022 12:42 PM

To: Elliott, Kelly A <kaelliott@blm.gov>

Subject: FW: [EXTERNAL] Flowline Removal for P&A Wells

Annie Sperandio

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From: Wyatt Jr, Billy B <bwyatt@blm.gov> **Sent:** Friday, August 19, 2022 12:24 PM

To: Kay, Ryan M <rmkay@blm.gov>; Sperandio, Annie M <asperandio@blm.gov>; Roberts, James R <j75rober@blm.gov>

Subject: FW: [EXTERNAL] Flowline Removal for P&A Wells

FYI...see preceding message...

From: Alan Harrison <AHarrison@kpk.com>

Sent: Friday, August 19, 2022 10:56 AM

To: Wyatt Jr, Billy B <bwyatt@blm.gov>

Cc: Lily Clark <lclark@kpk.com>; Ray Gorka <rgorka@kpk.com>

Subject: [EXTERNAL] Flowline Removal for P&A Wells

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Good morning Bill,

I'm not sure if you are the one to contact regarding flowline removals, if not I would greatly appreciate if you forward this email and direct me to the appropriate person.

We plugged and abandoned two wells late last year in the McCallum Unit, these are the:

- Federal #9-27 (05-057-06324) NW/SE Sec. 27-9N-78W; P&A Date = 9-21-2021; Cut & Cap Date = 10-18-2021
- McCallum Unit #90 (05-057-06167) NW/SW Sec. 2-9N-79W; P&A date = 9-29-2021; Cut & Cap Date = 10-18-2021

In the past (including prior operators such as Bonanza Creek) when any well was P&A'd the flowline was disconnected from the flowline riser at the wellhead and a bull plug installed. Likewise, the end point at the central battery manifold was capped in a similar manner. In cases where the flowline connects to an underground manifold the same process was followed, assuming the manifold could be located.

In speaking with Jeff Boxley our Field Supervisor he indicated that this manner of flowline abandonment has been the accepted practice, since it avoids creating a large amount of surface disturbance and the risk of damaging other active lines. The network of flowlines and injections lines is very extensive in the Unit and many of these are covered with the native plants and other regional habitat which may be difficult to reclaim.

We have received a NOAV from the COGCC regarding the flowline abandonment of the above wells. It is our understanding that if the BLM is in agreement with the method of abandonment described above the COGCC will accept this as well. (KPK would file a Form 44 indicating "abandonment in-place" and acknowledge BLM's agreement.)

Your attention to this matter is greatly appreciated Bill, as the COGCC has requested we provide a response as soon as possible.

Best Regards, Alan Harrison

*Alan C. Harrison
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