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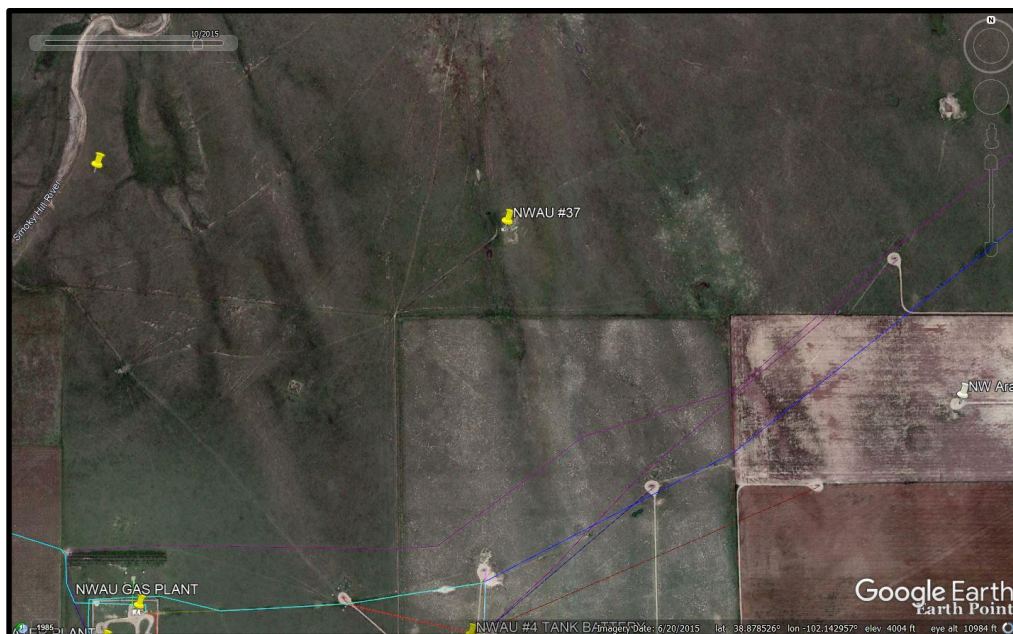
January 19, 2023

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

RE: Northwest Arapahoe Unit #37
COGCC Facility ID# 321848
Location Abandonment and Soils Investigation
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 Northwest Arapahoe Unit #37 in the coming weeks and months. The location in question is the site of an older Gas well that was drilled in 1990. 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 has performed an investigation of the flowlines in the area. It was determined that the process line that was attached to the Northwest Arapahoe #37 well heads south to the NWAU #4 tank battery. Mull has attached an abandon in place request by the landowner to this submittal. We have also attached the most recent flowline integrity test as well. When decommissioning of the entire facility – NWAU Plant – Mull will readdress whether the flow line needs to be removed.


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 I** 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 dictated by the levels of impacts. Subsequently any areas needing to go through reclamation will undergo that process as required by the state.

A lease road to the location exists concurrently with a road for the landowner's cattle operation. It appears to allow access to facilities deeper into the tenant's land. Mull will be attaching a request by the landowner to retain the lease road for his activities. Further communications between Mull and the division shall occur relating to the state of the road upon final decommissioning of the entire facility.

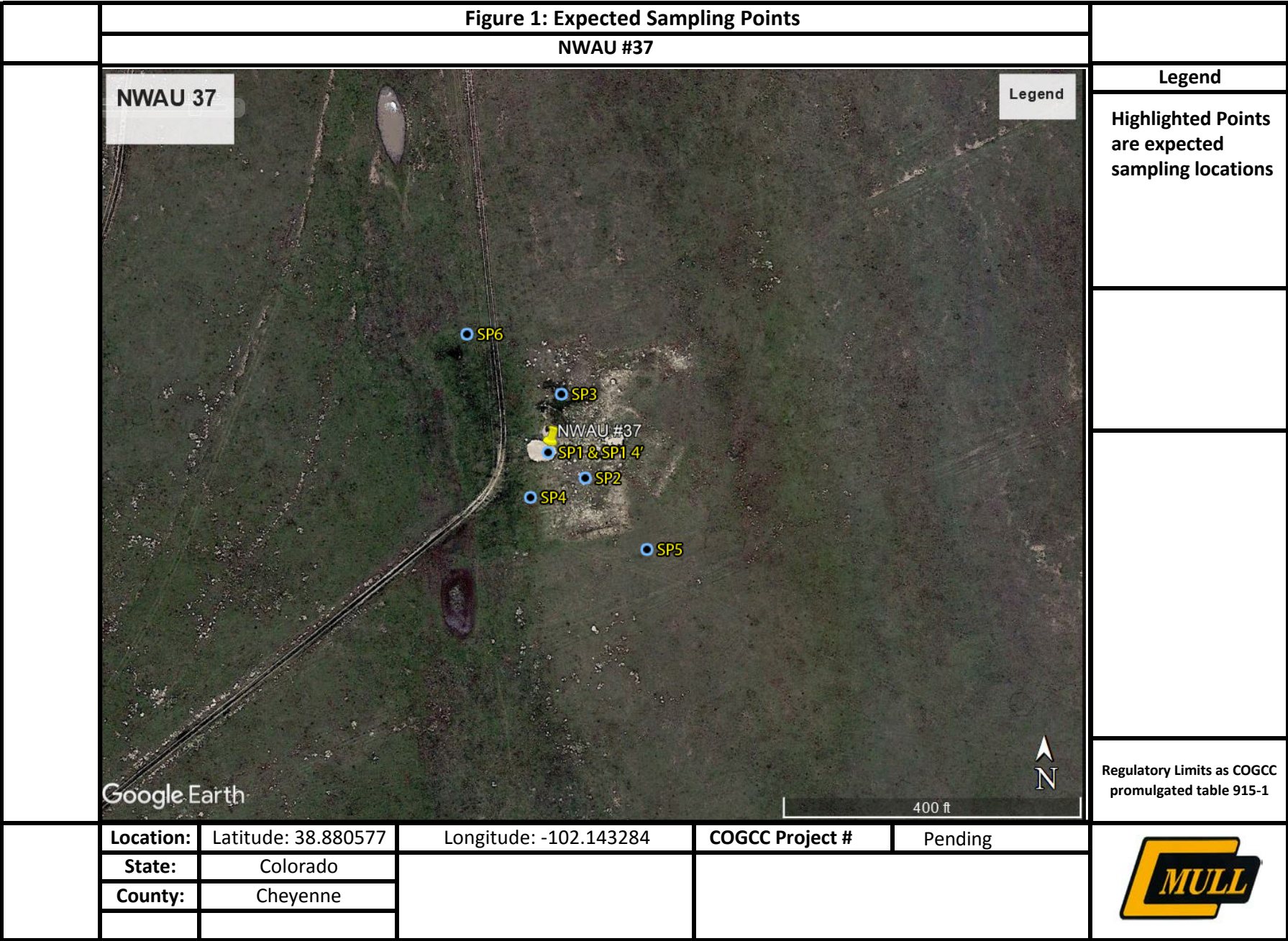
Should there be any questions or concerns feel free to contact us,

A handwritten signature in cursive script that reads "James Beilman".

James Beilman, PG, CPG
Director – Safety & Environmental
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Cell: +1 316.364.9203
JBeilman@Mulldrilling.com

Attachments:

Figure 1 – Expected Sampling Points




**AGREEMENT FOR IN PLACE ABANDONMENT OF FLOWLINE
AND RETAINMENT OF LEASE ROAD**

WHEREAS, Mull Drilling Company, Inc. installed a flowline connecting the Northwest Arapahoe Unit #37, located in the SW/4NW/4 Section 32, Township 13 South, Range 42 West, Cheyenne County, Colorado, to the NWAU #4 Tank Battery located in the SW/4SW/4 Section 32, Township 13 South, Range 42 West, Cheyenne County, Colorado. Said flowline is approximately 3200 feet long.

Paul D. Howard is the surface owner of the W/2 Section 32, Township 13 South, Range 42 West, Cheyenne County, Colorado and hereby grants Mull Drilling Company, Inc. permission to abandon said flowline in place, in an attempt to minimize impact to public health, safety, welfare, the environment and wildlife resources. Said abandonment shall conform to all appropriate procedures for in-place abandonment, as dictated by the Colorado Oil and Gas Commission (Series 1100 Rules).

Additionally, Mull Drilling Company, Inc. has abandoned the lease roads located in the NW/4 Section 32, Township 13 South, Range 42 West, Cheyenne County, Colorado. Paul D. Howard requests that said roads be left in place and hereby assumes all present and future rights and responsibilities associated therewith.

EXECUTED the 26 day of October, 2022.



Paul D. Howard

ACKNOWLEDGMENT

STATE OF Colorado)


ss:

COUNTY OF Cheyenne

The foregoing instrument was subscribed and sworn before me this 26 day of October, 2022, by Paul D. Howard.

Witness by hand and official seal:

10-19-2025
My Commission Expires:



Notary Public



NWAU #37
DAILY NORMAL OPERATING PSI=90

