

Re: COGCC FIELD INSPECTION REPORT [Doc#714002070, Loc Id: 333602 Name: OLSON-SMITH UNIT-N33N8W 8SESE] SUBMITTED NOTICE

From Andrew Price <aprice@abundance-energy.com>
 Date Tue 4/15/2025 11:03 AM
 To Mcdonough - DNR, Corey <corey.mcdonough@state.co.us>
 Cc COGCC Field Inspection Report <dnr_eform.helpdesk@state.co.us>; sjbcompliance@abundance-energy.com <sjbcompliance@abundance-energy.com>

We can ask for a variance but I disagree with your application of the rule because the riser is not abandoned, which is what the rule states (see highlighted below from rules and from your initial FIR).

Ownership is a non-issue because we own the Right-of-Way (ROW), pipelines within it and the wells that the active line and riser utilizes.

Could you please direct me to the correct form to request the variance?

1004. FINAL RECLAMATION OF WELL SITES AND ASSOCIATED PRODUCTION FACILITIES

- a. **Well sites and associated production facilities.** Upon the plugging and abandonment of a well, all pits, mouse and rat holes and cellars shall be backfilled. All debris, **abandoned**, gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well. All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and recontoured. Culverts and any other obstructions that were part of the access road(s) shall be removed. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. The burning or burial of such material on the premises shall be performed in accordance with applicable local, state, or federal solid waste disposal regulations and in accordance with the 900-Series Rules. In addition, material may be burned or buried on the premises only with the prior written consent of the surface owner. All such reclamation work shall be completed within three (3) months on crop land and twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities. The Director may grant an extension where

Inspector Name: Mcdonough, Corey

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| Operator has recently performed final reclamation activities, with evidence of drill rows and straw crimped mulch. Germination of desirable species was observed throughout the disturbance area. Operator shall continue to monitor and manage this site until the location meets Rule 1004 standards, including storm water and weed management. | |
| Inspection doc #714000107 observed risers in the western edge of the project area and required compliance by 8/19/2029. It was observed in this inspection that a gas line riser remains on location. Original CA has not been addressed. Original CA and date remains applicable. No CA date is being provided as this location is out of compliance for the same Rule. | |
| Corrective Action: | Date |
| Comply with Rule 1004.a to remove (regardless of ownership) all debris, abandoned , gathering line risers, flowline risers, and equipment within three months of plugging (5/9/2017) the associated facility. | |
| Overall Final Reclamation <input type="checkbox"/> In Process <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/> | |

Andrew Price
Vice-President, Abundance Energy
Mobile: 918-260-8324

From: Mcdonough - DNR, Corey <corey.mcdonough@state.co.us>
 Sent: Tuesday, April 15, 2025 10:55 AM
 To: Andrew Price <aprice@abundance-energy.com>
 Cc: COGCC Field Inspection Report <dnr_eform.helpdesk@state.co.us>; sjbcompliance@abundance-energy.com <sjbcompliance@abundance-energy.com>
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Or compliance with 1004 reclamation rules and regulations, requiring removal (regardless of ownership) all debris, gathering line risers, flowline risers and equipment.

On Tue, Apr 15, 2025 at 9:42 AM Mcdonough - DNR, Corey <corey.mcdonough@state.co.us> wrote:
 A variance would still be needed in this scenario.

Thanks,

On Tue, Apr 15, 2025 at 8:30 AM Andrew Price <aprice@abundance-energy.com> wrote:
 Hey Corey. No worries on the delay.

The riser is active as it is part of a pipeline from the well pad to the north. See image below and the original photo annotated to show the wells that are associated with the riser.

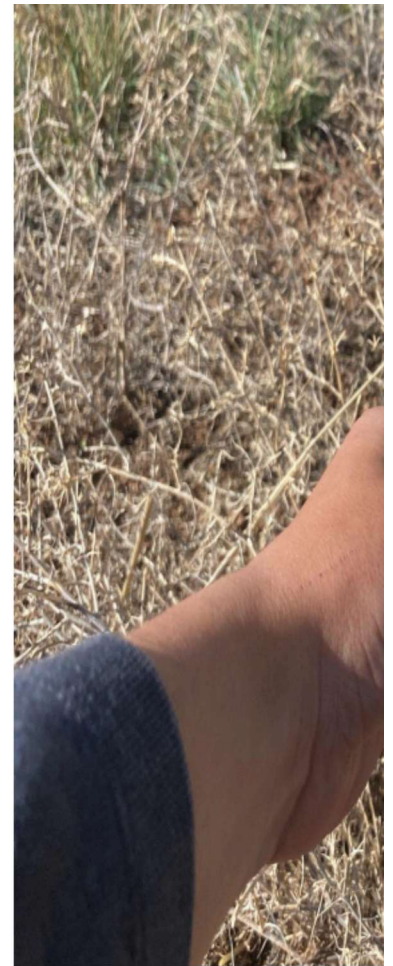


Photo 4. Gas line riser that remains in the northwest corner of the pi

Andrew Price
 Vice-President, Abundance Energy

Mobile: 918-260-8324

From: Mcdonough - DNR, Corey <corey.mcdonough@state.co.us>

Sent: Tuesday, April 15, 2025 9:03 AM

To: Andrew Price <aprice@abundance-energy.com>

Cc: COGCC Field Inspection Report <dnr_iform.helpdesk@state.co.us>; sjbcompliance@abundance-energy.com <sjbcompliance@abundance-energy.com>

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Good Morning Andrew,

Sorry for the delayed response. I was able to speak with my team lead and where the gathering line is active, the riser is not and is associated with the plugged and abandoned well. All surface equipment would require removal, or a final reclamation variance would need to be submitted to leave any risers on the location.

Thanks,

Corey

On Fri, Apr 11, 2025 at 1:38 PM Andrew Price <aprice@abundance-energy.com> wrote:

Good afternoon Corey,

The mentioned gathering line riser is active (not abandoned) because it provides gathering for wells nearby and therefore cannot be removed at this time.

Please let us know your thoughts on this as it relates to the stated Rule 1004.a violation before the inspection form is posted.

Andrew Price

Vice-President, Abundance Energy

Mobile: 918-260-8324

From: COGCC Field Inspection Report <dnr_iform.helpdesk@state.co.us>

Sent: Friday, April 11, 2025 1:02 PM

To: Andrew Price <aprice@abundance-energy.com>; sjbcompliance@abundance-energy.com <sjbcompliance@abundance-energy.com>

Cc: corey.mcdonough@state.co.us <corey.mcdonough@state.co.us>

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Colorado
Energy and Carbon
Management
Commission

Department of Natural Resources

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COGCC Field Inspection Report

ATTACHED REPORT HAS BEEN SUBMITTED TO ECMC DATABASE BASED ON FIELD INSPECTION RESULTS. OPERATORS HAVE SEVEN (7) DAYS TO REVIEW BEFORE THE INSPECTION FORM IS POSTED TO THE WEBSITE.

PLEASE REVIEW ENTIRE REPORT. **COMMENTS** ARE HIGHLIGHTED IN **BLUE**,
CORRECTIVE ACTION ITEMS ARE HIGHLIGHTED IN **RED**.