



ARCADIS U.S., Inc.  
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Buffalo, Wyoming  
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Tel 307 684 5891  
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[www.arcadis-us.com](http://www.arcadis-us.com)

State of Colorado  
Attn: COGCC Director, Matt Lepore  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

ENVIRONMENT

Subject:

Rule 502.b Variance Letter Request for Reclamation of a Portion of the Koch 22-7 2  
Access Road Formerly Operated by Citation Oil and Gas Corporation (Citation)

Date:  
October 28, 2015

Dear Mr. Lepore,

Contact:  
Ben Shoup

This letter is submitted on behalf of Citation and is in regards to a reclamation variance request for a portion of the Koch 22-7 2 access road. The landowner, Mr. William Lyons, has requested a portion of the access road not be reclaimed as it initially replaced a two track following a fence line on his property. Per conversations with Ryan Costa, the COGCC inspector responsible for this site, Citation was instructed to follow guidance for this variance request from the document titled: Rule 502.b Variance Requirements, dated October 10, 2014. Rule 502.b also requires a formal variance via Rule 1001.c to waive final reclamation. Documentation for Rule 1001.c can be found in the attached Appendices.

Phone:  
(307) 684-5891

Email:  
[Ben.shoup@arcadis-us.com](mailto:Ben.shoup@arcadis-us.com)

Our ref:  
WY002655.0001

The subject location is the access road to the Koch 22-7 2 (Facility ID# 218128, API# 05-073-06113) well pad, located in the SENW, of T12S R52W, Clifford Field, Lincoln County, CO. Specifically, the section from County Road 63 heading east until it turns north toward the well pad (approximately 0.35 miles east of County Road 63).

The proposed variance does not meet the final reclamation requirements of Rule 1004 by not having final reclamation at the site. Citation is prepared to reclaim the site but the landowner would like a portion of the two-track road to stay "as-is" for ranching operations. Compliance of Rule 1004 is not achievable and a variance is requested. The proposed variance will not violate the basic intent of the Oil and Gas Conservation Act as it will not impact the protection of public health, safety, welfare or environment.

Impacted parties include Citation and the landowner, William Lyons, who requested the variance (Appendix 3). If the variance is granted, no further work on the road will

Imagine the result

be required as it is stable and is free of equipment and trash. Per a call with Ryan Costa on 6/23/15, he stated the landowner waiver for the Rule 1001.c would also be used for the Rule 502.b variance requirement.

Sincerely,

ARCADIS U.S., Inc.



Ben Shoup  
Client Director, Oil and Gas Sector

Copies:  
Ethan Jahnke, Principal Scientist

/file

Enclosures

Appendix 1 – Rule 1001.c Requirement: COGCC Form 6 Approved for Koch 22-7 2 Well  
Appendix 2 – Rule 1001.c Requirement: Photolog of Koch 22-7 2 Well and Access Road  
Appendix 3 – Rule 1001.c Landowner Variance Request



## Appendix 1



02285616

1/2

FORM

6

Rev  
02/11

state of Colorado

## Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80205 Phone: (303) 894-2100 Fax: (303) 894-2109



DE ET OE ES

Date Received:

## WELL ABANDONMENT REPORT

This form is to be submitted as an Intent to Abandon whenever an abandonment is planned on a borehole. After the abandonment is complete, this form shall again be submitted as a Subsequent Report of the actual work completed. The approved intent shall be valid for six months after the approval date, after that period, a new intent will be required. Attachments required with the Intent to Abandon are wellbore diagrams of the current configuration and the proposed configuration with plugs set.

A Subsequent Report of Abandonment shall indicate the actual work completed. Attachments required with a Subsequent Report are a wellbore diagram showing plugs that were set and casing remaining in the hole, the job summaries from all plugging contractors used, including wireline and cementing (third party verification) and any logs that may have been run during abandonment.

RECEIVED

Document Number:

OCT 31 2011

COGCC

OGCC Operator Number: 17180

Contact Name: Kimberly Moorhead

Name of Operator: Citation Oil &amp; Gas Corp.

Phone: (281) 891-1555

Address: P O Box 690688

Fax: (281) 460-2168

City: Houston

State: TX

Zip: 77269-0688

Email: kmoorhead@cogc.com

For Intent 24 hour notice required, Name: \_\_\_\_\_

Tel: \_\_\_\_\_

COGCC contact:

Email: \_\_\_\_\_

API Number 05-073-06113---

Well Name: Koch

Well Number: 2

Location: QtrQtr: SENW

Section: 7

Township: 12S

Range: 52W

Meridian: 6th PM

County: Lincoln

Federal, Indian or State Lease Number: \_\_\_\_\_

Field Name: Clifford

Field Number: \_\_\_\_\_



Notice of Intent to Abandon



Subsequent Report of Abandonment

Only Complete the Following Background Information for Intent to Abandon

Latitude: \_\_\_\_\_

Longitude: \_\_\_\_\_

GPS Data:

Data of Measurement: \_\_\_\_\_

PDOP Reading: \_\_\_\_\_

GPS Instrument Operator's Name: \_\_\_\_\_

Reason for Abandonment:

☐ Dry☐ Production for Sub-economic☐ Mechanical Problems☐ Other \_\_\_\_\_Casing to be pulled: ☐ Yes☐ No

Top of Casing Cement: \_\_\_\_\_

Fish in Hole: ☐ Yes☐ No

If yes, explain details below

Wellbore has Uncemented Casing leaks: ☐ Yes☐ No

If yes, explain details below

Details: \_\_\_\_\_

## Current and Previously Abandoned Zones

| Formation | Code | Perf. Top | Perf. Btm | Date | Method of Isolation | Plug Depth |
|-----------|------|-----------|-----------|------|---------------------|------------|
| Marmaton  |      | 6009      | 6012      |      | Sqz'd w/ 200 Sx     |            |
|           |      |           |           |      |                     |            |

Total: 0 zone(s)

## Casing History

| Casing Type | Size of Hole | Size of Casing | Weight Per Foot | Setting Depth | Sacks Cement | Cement Bot | Cement Top | Status |
|-------------|--------------|----------------|-----------------|---------------|--------------|------------|------------|--------|
| Surface     | 13 3/8"      | 7"             | 68#             | 308           | 300          | 308        | Surface    |        |
| Production  | 8 3/4"       | 7"             | 23              | 5315          | 350          | 5315       | 6000       |        |

## Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 3300 with 2 sacks cmt on top. CIBP #2: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.  
 CIBP #3: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top. CIBP #4: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.  
 CIBP #5: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

|  |                  |                                       |
|--|------------------|---------------------------------------|
| Set _____ sks cmt from _____ ft. to _____ ft. in | Plug Type: _____ | Plug Tagged: <input type="checkbox"/> |
| Set _____ sks cmt from _____ ft. to _____ ft. in | Plug Type: _____ | Plug Tagged: <input type="checkbox"/> |
| Set _____ sks cmt from _____ ft. to _____ ft. in | Plug Type: _____ | Plug Tagged: <input type="checkbox"/> |
| Set _____ sks cmt from _____ ft. to _____ ft. in | Plug Type: _____ | Plug Tagged: <input type="checkbox"/> |
| Set _____ sks cmt from _____ ft. to _____ ft. in | Plug Type: _____ | Plug Tagged: <input type="checkbox"/> |

Perforate and squeeze at 3275 ft. with 70 sacks. Leave at least 100 ft. in casing 3175 CIGR Depth  
 Perforate and squeeze at 2922 ft. with 30 sacks. Leave at least 100 ft. in casing 2822 CIGR Depth  
 Perforate and squeeze at 360 ft. with 50 sacks. Leave at least 100 ft. in casing 260 CIGR Depth  
 (Cast Iron Cement Retainer Depth)

Set \_\_\_\_\_ sacks half in. half out surface casing from \_\_\_\_\_ ft. to \_\_\_\_\_ ft. Plug Tagged: ☐

Set 20 sacks at surface

Cut four feet below ground level, weld on plate Above Ground Dry-Hole Marker: ☐ Yes ☐ No

Set \_\_\_\_\_ sacks in rat hole Set \_\_\_\_\_ sacks in mouse hole

### Additional Plugging Information for Subsequent Report Only

Casing Recovered: \_\_\_\_\_ ft. of \_\_\_\_\_ inch casing Plugging Date: 10/12/2011  
 \*Wireline Contractor: Peak Wireline Service, INC. \*Cementing Contractor: Allied Cementing Co., LLC  
 Type of Cement and Additives Used: Common  
 Flowline/Pipeline has been abandoned per Rule 1103 ☒ Yes ☐ No \*ATTACH JOB SUMMARY

Provide Technical Detail:

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: Kimberly Moorhead Print Name: Kimberly Moorhead  
 Title: Completion Analyst Date: 10/26/2011 Email: kmoorhead@cogc.com

Based on the information provided herein, this Well Abandonment Report (Form 6) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: \_\_\_\_\_ Date: \_\_\_\_\_

CONDITIONS OF APPROVAL, IF ANY:

### Attachment Check List

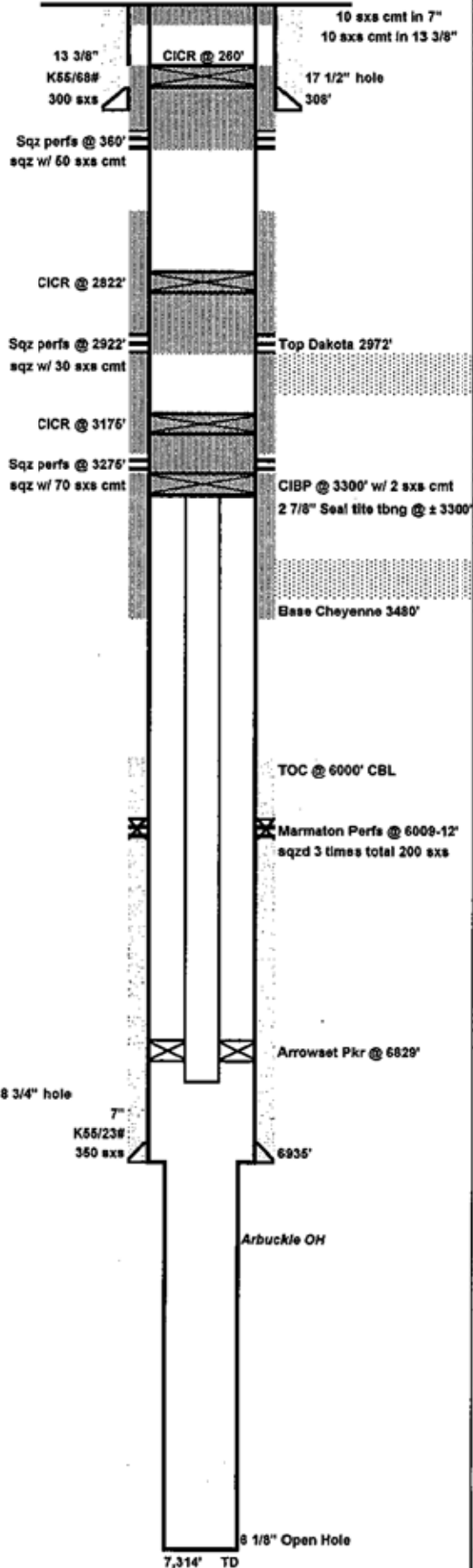
| Att Doc Num    | Name                        |
|----------------|-----------------------------|
| <u>2285617</u> | <u>wellbore diagram</u>     |
| <u>2285618</u> | <u>wireline Job Summary</u> |

Total Attach:

2285619 Cement Job Summary



Form 6  
2285616

**FINAL**

|                                 |          |                        |           |
|---------------------------------|----------|------------------------|-----------|
| Lease:                          |          | Well No.               | Koch #2   |
| API No. 05-073-06113            |          | Status                 | PA        |
| Location: SENW Sec. 7 T12S-R52W |          |                        |           |
| County:                         | Lincoln  | State:                 | CO        |
| Field:                          | Clifford | Spud Date:             | 5/11/1983 |
| TD                              | 7314'    | GL                     | 4947'     |
| PBTD                            | 7309'    | KB                     | 4956'     |
| Current Perfs/OH: OH 6935-7309' |          | Current Zone: Arbuckle |           |

|              |                |                |  |
|--------------|----------------|----------------|--|
| Unit Make:   |                | Unit Size:     |  |
| Unit S/N:    |                | Unit Rotation: |  |
| SPM:         | Stroke Length: | Unit Sheave:   |  |
| Prime Mover: |                | Motor Sheave:  |  |
| Motor S/N:   |                | Motor RPM:     |  |

|            | Size    | Grade / Wt | Depth      | Hole Size | Cement  |
|------------|---------|------------|------------|-----------|---------|
| Surface    | 13 3/8" | K55/68#    | 308'       | 17 1/2"   | 300 sxs |
| Production | 7"      | K55/23#    | 5315'      | 8 3/4"    | 350 sxs |
| Production | 7"      | N80/26#    | 5315-6935' | 8 3/4"    | 350 sxs |
| Production |         |            |            |           |         |
| Liner      |         |            |            |           |         |

[illegible][illegible]

## Comments

|                 |                    |
|-----------------|--------------------|
| PREPARED BY: JH | UPDATED: 7/28/2011 |
|-----------------|--------------------|

**PEAK WIRELINE SERVICES, INC.**

P.O. Box 864

Cheyenne Wells, CO 80810

Phone 719-767-8707

Fax 719-767-5522

Invoice

4971 Form 6  
2285616**REMIT TO:**Wireline 1/2  
Job Summary

DATE 10-11-2011  
10/10/2011  
 OCT 31 2011  
00000

CHARGE TO:

CITATION IN GAS INC

ADDRESS

LEASE AND WELL NO.

KCCN 27-7

FIELD

NEAREST TOWN

COUNTY

LINCOLN

STATE

CO

CUSTOMER'S ORDER NO.

GEOFF WOLFE

SEC.

7

TWP.

12S

RANGE

52W

ZERO

GROUND LEVEL

CASING SIZE

7"

WEIGHT

25"

CUSTOMER'S T.D.

PEAK WL SERVICES T.D.

FLUID LEVEL

1020

ENGINEER

HENDERSON

OPERATOR

LAWRENCE

**PERFORMING**

| CODE REFERENCE | DESCRIPTION | NO HOLES | DEPTH FROM | TO   | AMOUNT |
|----------------|-------------|----------|------------|------|--------|
| 113000         | 3 1/2" HCA  | 4        | 3275       | 3276 | 850    |
|                |             | 4        | 2922       | 2923 | 450    |
|                |             | 4        | 360        | 361  | 450    |
|                |             | 4        | 2800       | 2801 | 450    |

**PLUGS, PACKERS, AND OTHER**

| CODE REFERENCE | MFG. TYPE | CASING SIZE | WEIGHT | DEPTH | AMOUNT |
|----------------|-----------|-------------|--------|-------|--------|
| 143010         | WATERMANN | 7"          | 23"    | 3175  | 2300   |
| 143010         | WATERMANN | 7"          | 23"    | 2872  | 2300   |
| 145010         | WATERMANN | 7"          | 23"    | 260   | 2300   |

**MATERIAL INVENTORY**

|  |  |  |  |  |  |
|--|--|--|--|--|--|
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

**TRUCK RENTAL**

| CODE REFERENCE | RUN NO. | PREVIOUS INVOICE NO. | AMOUNT |
|----------------|---------|----------------------|--------|
| 102995         | ONE     |                      | 800    |

| DEPTH OF OPERATIONS CHARGES |      |      |          |               |        |
|-----------------------------|------|------|----------|---------------|--------|
| CODE REFERENCE              | FROM | TO   | NO. FEET | PRICE PER FT. | AMOUNT |
| 142005                      | 10   | 375  | 375      | MIN           | 850    |
| SETTING CHARGE              |      |      |          |               |        |
| 142005                      | 10   | 2822 | 2822     | MIN           | 850    |
| SETTING CHARGE              |      |      |          |               |        |
| 142005                      | 01   | 260  | 260      | MIN           | 850    |

SUB TOTAL

10775

TAX

31277

PLEASE PAY FROM THIS INVOICE  
TOTAL

1109777

RECEIVED THE ABOVE SERVICE ACCORDING TO THE TERMS AND CONDITIONS SPECIFIED BELOW WHICH  
 WE HAVE READ AND TO WHICH WE HEREBY AGREE.

Customer

Geoff Wolfe

**General Terms and Conditions**

- All accounts are to be paid within the terms fixed by Peak Wireline Services invoices; and should these terms not be observed, interest at the rate of 1.5% per month will be charged from the date of such invoice.
- Because of the uncertain conditions existing in a well which are beyond the control of Peak Wireline Services, it is understood by the customer that Peak Wireline Services cannot guarantee the results of their service and will not be held responsible for personal or property damage in the performance of their services.
- Should any of Peak Wireline Services instruments be lost or damaged in the performance of the operation requested, the customer agrees to make every reasonable effort to recover same, and to reimburse Peak Wireline Services for the value of the items which cannot be recovered, or the cost of repairing damage to items recovered.
- It is further understood and agreed that all depth measurements shall be supervised by the customer or its employees and customer hereby certifies that the zones, as shot were approved.
- The customer certifies that it has the full right and authority to order such work on such well and that the well in which the work is to be done by Peak Wireline Services is in proper and suitable conditions for the performance of said work.
- No employee is authorized to alter the terms or conditions of this agreement.

## 4970

 $\frac{2}{2}$ 

P.O. Box 864  
Cheyenne Wells, CO 80810  
Phone 719-767-8707  
Fax 719-767-5522

DATE 10-6-2019

# Invoice

CHARGE TO:

ADDRESS

LEASE AND WELL NO. KOCH 22-7

FIELD

NEAREST TOWN

COUNTY LINCOLNSTATE 

CUSTOMER'S ORDER NO. GROFF WOLFE

SEC.

TWP. 123

RANGE 5 mi.

ZERO 10 M.

### CASING SIZE

WEIGHT 23"

CUSTOMER'S T.D.

**PEAK WL SERVICES T.D.**

FLUID LEVEL 1901

ENGINEER

OPERATOR *Lawrence*

**MATERIAL INVENTORY**

RECEIVED THE ABOVE SERVICE ACCORDING TO THE TERMS AND CONDITIONS SPECIFIED BELOW WHICH  
WE HAVE READ AND TO WHICH WE HEREBY AGREE.


Customer

## General Terms and Conditions

- (1) All accounts are to be paid within the terms fixed by Peak Wireline Services invoices; and should these terms not be observed, interest at the rate of 1.5% per month will be charged from the date of such invoice.
- (2) Because of the uncertain conditions existing in a well which are beyond the control of Peak Wireline Services, it is understood by the customer that Peak Wireline Services cannot guarantee the results of their service and will not be held responsible for personal or property damage in the performance of their services.
- (3) Should any of Peak Wireline Services' instruments be lost or damaged in the performance of the operation requested, the customer agrees to make every reasonable effort to recover same, and to reimburse Peak Wireline Services for the value of the items which cannot be recovered, or the cost of repairing damage to items recovered.
- (4) It is further understood and agreed that all depth measurements shall be supervised by the customer or its employees and customer hereby certifies that the zones, as shot were approved.
- (5) The customer certifies that it has the full right and authority to order such work on such well and that the well in which the work is to be done by Peak Wireline Services is in proper and suitable conditions for the performance of said work.
- (6) No employee is authorized to alter the terms or conditions of this agreement.



## Appendix 2

|   |                 |   |  |
|---|-----------------|---|--|
| <b>Project Name:</b><br>Citation:<br>WY002566 Lincoln County Pad<br>Remediation |                 | <b>Site Location:</b><br>Lincoln County, Colorado                                   | <b>Date:</b> March 11 and June 18, 2015<br><br><b>Photographed By:</b><br>Ethan Jahnke |
| <b>Photo No.</b><br>1   | Koch 22-7-<br>2 |  |  |
| <b>Direction Photo Taken:</b><br><br>North                                      |                 |   |  |
| <b>Description:</b><br><br>Looking north at reclaimed<br>Koch 22-7 2 pad        |                 |   |  |

|   |                 |  |
|---|-----------------|--|
| <b>Photo No.</b><br>2   | Koch 22-7-<br>2 |  |
| <b>Direction Photo Taken:</b><br><br>West                               |                 |  |
| <b>Description:</b><br><br>Looking west at reclaimed<br>Koch 22-7 2 pad |                 |  |

|  |                 |   |
|--|-----------------|---|
| <b>Photo No.</b><br>3  | Koch 22-7-<br>2 |  |
| <b>Direction Photo Taken:</b><br><br>South                               |                 |   |
| <b>Description:</b><br><br>Looking south at reclaimed<br>Koch 22-7 2 pad |                 |   |

|   |                 |   |
|---|-----------------|---|
| <b>Photo No.</b><br>4   | Koch 22-7-<br>2 |  |
| <b>Direction Photo Taken:</b><br><br>East                               |                 |   |
| <b>Description:</b><br><br>Looking east at reclaimed<br>Koch 22-7 2 pad |                 |   |

|   |                 |  |
|---|-----------------|--|
| Photo No.<br>5  | Koch 22-7-<br>2 |  |
| Direction Photo Taken:<br><br>South                             |                 |  |
| Description:<br><br>Looking south at Koch 22-7<br>2 access road |                 |  |

|   |                 |  |
|---|-----------------|--|
| <b>Photo No.</b><br>6   | Koch 22-7-<br>2 |  |
| <b>Direction Photo Taken:</b><br><br>East                                     |                 |  |
| <b>Description:</b><br><br>Looking east at former Koch<br>22-7 2 pit location |                 |  |



|   |                 |  |
|---|-----------------|--|
| <b>Photo No.</b><br>7   | Koch 22-7-<br>2 |  |
| <b>Direction Photo Taken:</b><br><br>East   |                 |  |
| <b>Description:</b><br><br>Looking east at Koch 22-7 2 access road that landowner is requesting a variance from reclamation |                 |  |

|  |                 |  |
|--|-----------------|--|
| Photo No.<br>8   | Koch 22-7-<br>2 |  |
| Direction Photo Taken:<br><br>East   |                 |  |
| Description:<br><br>Looking east at Koch 22-7 2 access road that landowner is requesting a variance from reclamation. At the end of this road is where the reclamation will begin. |                 |  |



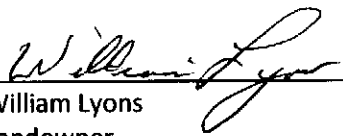
June 23, 2015

William Lyons  
36600 County Road 35  
Hugo, CO 80821

Citation Oil and Gas Corporation  
15562 HWY 385  
Cheyenne Wells, CO 80825

RE: Landowner Waiver of Reclamation Regarding Portion of Access Road to Koch 22-7 2 Well Pad

- A. Location of Waiver: Koch 22-7 2, SENW, T12S R52W, Clifford Field, Lincoln County, CO, API 05-073-06113. The landowner requests Citation and the COGCC to allow a portion of the access road to the former Koch 22-7 2 well pad (218128) not be reclaimed. Specifically, the section from County Road 63 heading east until it turns north toward the well pad (approximately 0.35 miles east of County Road 63).
- B. Reason for Waiver: The landowner requests that section of the road remain as it adjacent to a fence line and the road replaced a two-track road. The landowner would also like to potentially use the site as a water station for his cattle.
- C. Liability: The landowner accepts future responsibility for reclamation and topsoil protection.
- D. Understanding: The landowner understands that once a waiver is signed he will waive all reclamation protections.
- E. Reclamation Plan for Adjacent Area: The area not subject to the requested variance has been reclaimed using a combination of ripping, manure and drill-seeding (see attached pictures). Weeds will be kept under control using common standard practices.

  
\_\_\_\_\_  
William Lyons  
Landowner

9-10-15  
Date