



Shell Exploration & Production

Shell Frontier Oil & Gas Inc.
150 North Dairy Ashford, A466D
Houston Texas 77079

September 10, 2015

USPS Tracking 7008 3230 0002 3193 7961
Paul Daggett
Bureau of Land Management – White River Field Office
220 E. Market Street
Meeker, CO 81641

USPS Tracking 7008 3230 0002 3193 7978
Travis Marshall
Colorado Division of Reclamation, Mining and Safety
101 South 3rd Street, Suite 301
Grand Junction, CO 81501

RECEIVED

SEP 14 2015

GRAND JUNCTION FIELD OFFICE
DIVISION OF
RECLAMATION MINING & SAFETY

SUBJECT: Shell Frontier Oil & Gas Inc., BLM Plan of Development, lease COC69166, and DRMS NOI P-2020-026, Request for Approval to Cease Monitoring and Proceed with Well Plugging and Abandonment.

Dear Mr. Daggett and Mr. Marshall:

In accord with the Plan of Development (POD) and Sampling and Analysis Plan (SAP) for the East Research Lease Development and Demonstration Lease (ERDD), Shell Frontier Oil & Gas Inc. (SFOGI) respectfully requests to discontinue groundwater monitoring at the six monitoring locations SFOGI has operated at the ERDD. The wells are designated as follows: 135-4-198-L4, 138-4-298-UT, 138-4-298-A, 138-4-298-B, 138-4-298-L5, and 138-4-298-L4.

The POD and SAP describe the frequency and duration of water quality sampling. According to the POD quarterly sampling would occur for 1 year, then annually for the following two years. The SAP sampling was scheduled to be quarterly and completed two years after project completion. The project was ceased in September 2013. Pyrolysis was never initiated; therefore, no oil and gas production occurred.

Groundwater monitoring continued into the third quarter of 2015 with analyses received. Attached is a summary spreadsheet with the water quality data. This data have been provided to the BLM annually. The water quality continues to meet standards and no exceedences of the numeric protection levels have occurred, nor have water levels been affected. The organics that originated from the transport of water to the 135-4-298 well continue to decrease and, as discussed, they have not been present in concentrations exceeding the groundwater quality standards.

SFOGI therefore requests release of the last annual sampling, noted in the POD, and requests written authorization from the BLM and DRMS to discontinue the groundwater measurements to allow SFOGI to proceed with Plug and Abandonment of the groundwater monitoring wells and to perform reclamation of the Project site.

Please note that SFOGI considers the attachment to this letter, the water quality data, to be confidential information because it relates to the nature, size, and location of the mineral deposit.

If you have any questions regarding the information in this submittal, please contact me at 832-337-4571 or email: flo.vuelvas@shell.com

Sincerely,



Florentino Vuelvas
Staff Environmental Engineer

Attachments (1) Groundwater Quality Data for ERDD

Attachment

Groundwater Quality Monitoring Results (following pages)

CONFIDENTIAL

Table 5-1 Water Quality for Wells on BLM Lands.
Through August 2015
See below Table for Notes

ERD&D Lease

Sample Point, Sample Date, Hydro-Stratigraphic Interval			Chemical name	Aluminum	Antimony	Arsenic	Barium	Beryllium	Bicarbonate (as CaCO3)	Boron	Bromide	Cadmium	Calcium	Carbonate (as CaCO3)	Chloride	Chromium	Cobalt	Copper	Total Cyanide	Fluoride	Hardness (Ca+Mg)	Iron	Lead	Lithium	Magnesium	Manganese	Mercury	Nickel	Nitrate/Nitrite As Nitrogen	Nitrogen (As N)	pH - Laboratory	Phosphorus	Potassium	Radium 226 + Alpha Emitting Radium	Radium 228	Total Dissolved Solids	Total Dissolved Solids (CALC)	Total Suspended Solids	Selenium	Silica	Silver	Sodium	Strontium		
Sample Point	Sample Date	Hydro-Stratigraphic Interval	Sample Type	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L		
138-4-298-L4	6/3/2011	L4	GW Sample	<0.6	<0.008	0.05	3.99	0.008*	18800	3.7	<2	0.003*	6*	790	<2	2070	<0.01	<0.2	<0.2	<0.02	63	31*	<0.4	<0.002	1.1*	<4	<0.1	<0.002	<0.01	0.35	15.4	8.3	0.78	25*	12	3.4	15.4	34700	23500	8*	0.007	17*	<0.001	8440	0.7*
138-4-298-L4	6/23/2011	L4	GW Sample	<0.6	<0.008	0.04	4.84	0.007*	29100	4.5	<0.5	0.004*	10*	1500	<2	710	0.05	<0.2	<0.2		69.8	41*	<0.4	<0.002	1.1*	<4	<0.1	<0.002	<0.01	0.01*	15.8	8.2	0.88	14*	19	5.3	24.2	27200	28400	14*	0.007	20*	<0.001	10500	0.7*
138-4-298-L4	10/9/2011	L4	GW Sample	<0.3	<0.003	0.09*	4.80		20200	4.7		0.005*	4*		<2	510	<0.03	<0.1	<0.1		68.5	18*	<0.2	<0.002	1.1	2*	<0.05	<0.002	<0.03		22	17.4		20			0.012	20*	<0.001	9680	0.8				
138-4-298-L4	3/27/2012	L4	GW Sample	<0.6	<0.008	0.05	5.41		27500	5.5		<0.002	<4		<2	450	<0.01	<0.2	<0.2		66.4	15*	<0.4	<0.002	1.2*	5*	<0.1	<0.001	<0.01	<0.02	17.3		21			<0.002	21*	<0.001	11900	0.8*					
138-4-298-L4	5/18/2012	L4	GW Sample	<0.6	<0.008	0.05	5.75		26400	5.9		0.003*	6*		<2	360	<0.01	<0.2	<0.2		65.8	20*	<0.4	<0.002	1.2*	<4	<0.1	<0.004	<0.01	<0.02	17.3		35			0.002*	20*	<0.001	11500	0.8*					
138-4-298-L4	11/27/2012	L4	GW Sample	<0.6	<0.004	0.048	3.95	<0.003	22900	4.1	<5	<0.005	9*	<20	<2	520	<0.005	<0.2	<0.2	<0.003	58	28*	1.2	<0.001	0.8*	6*	<0.1	<0.001	<0.008	<0.029	12.4	8.3	0.9	25*	12	5.2	17.2	23300	23800	26	<0.002	24*	<0.001	8410	0.8*
138-4-298-L4	2/2/2013	L4	GW Sample	<0.6	<0.004	0.022	6.8		27900	6.2		0.004*	8*		<2	580	<0.01	<0.2	<0.2	<0.03	61	31*	0.8*	6*	5*	<0.1	<0.002	<0.01	<0.02	14.8			25*			<0.002	26*	<0.001	12100	1					
138-4-298-L4	6/22/2013	L4	GW Sample	<0.6	<0.008	0.016*	7.43		25800	6		0.004*	8*		<2	550	<0.01	<0.2	<0.2		59	42*	0.7*	0.003*	1*	5*	<0.1	<0.002	<0.01	<0.02	15			26*			<0.002	27*	<0.001	12300	1				
138-4-298-L4	9/18/2013	L4	GW Sample			0.022	7.74			6.3					360					58.8																									
138-4-298-L4	10/28/2013	L4	GW Sample			0.024	7.95			6.3					350					58																									
138-4-298-L4	11/19/2013	L4	GW Sample			0.023	7.58			6.2					350					58																									
138-4-298-L4	12/17/2013	L4	GW Sample			0.02	8.25			6.4					350					57																									
138-4-298-L4	1/7/2014	L4	GW Sample			0.022	8.41			6.4					330					56																									
138-4-298-L4	2/19/2014	L4	GW Sample			0.022	8.68			6.7					330					61																									
138-4-298-L4	2/19/2014	L4	GW Sample			0.02	8.23			6.4					330					60.2																									
138-4-298-L4	4/14/2014	L4	GW Sample			0.024	8.44			6.5					320					60.2																									
138-4-298-L4	5/13/2014	L4	GW Sample			0.02	8.43			6.8					340					62.6																									
138-4-298-L4	6/2/2014	L4	GW Sample			0.033*	8.17			6.4					320					61.1																									
138-4-298-L4	7/1/2014	L4	GW Sample			0.02	8.67			6.7					330					61.7																									
138-4-298-L4	8/25/2014	L4	GW Sample			0.018*	8.78			7.5					330					61.7																									
138-4-298-L4	9/18/2014	L4	GW Sample			0.022	8.9			7.2					260					63.9																									
138-4-298-L4	10/16/2014	L4	GW Sample			0.019*	9.18			7.2					278					61.4																									
138-4-298-L4	11/17/2014	L4	GW Sample			0.007*	8.48			7.5					220					64.3																									
138-4-298-L4	12/16/2014	L4	GW Sample			0.017*	9.01			7.3					237					67.7																									
138-4-298-L4	1/8/2015	L4	GW Sample			0.011*	9.55			6.9					238					64.7																									
138-4-298-L4	2/4/2015	L4	GW Sample			0.018	8.68			6.8					305					63.9																									
138-4-298-L4	3/4/2015	L4	GW Sample			0.016*	8.85			7.1					260					63.9																									
138-4-298-L4	4/7/2015	L4	GW Sample			0.018*	9.58			7.2					305					61																									
138-4-298-L4	5/5/2015	L4	GW Sample			0.022	9.01			7.2					68.5																														

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