



STATE OF  
COLORADO

Andrews - DNR, Doug <doug.andrews@state.co.us>

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## COGCC Form 2A review of Bayswater Exploration's Holton 31-12 Pad - Doc #400591342

5 messages

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**Jennifer Grosshans** <jgrosshans@petro-fs.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>  
Cc: Ann Stephens <astephens@petro-fs.com>

Tue, Apr 29, 2014 at 3:32 PM

Doug,

Please find attached the new location drawing for the Holton 31-12 Pad.

Please note the new disturbance area is 6.06 acres for Drilling Operations and 3.03 acres for Interim Reclaim.

Thank you for your guidance. Please do not hesitate to contact me if you need further information.

Jennifer Grosshans  
Regulatory Technician  
Petroleum Field Services LLC  
Office: 303-928-7128  
Fax: 303-318-5678  
7535 Hilltop Circle  
Denver, CO 80221



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 **BEP\_HOLTON\_31\_12\_Location\_Drawing.pdf**  
998K

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**Andrews - DNR, Doug** <doug.andrews@state.co.us>  
To: Jennifer Grosshans <jgrosshans@petro-fs.com>  
Cc: Ann Stephens <astephens@petro-fs.com>

Wed, Apr 30, 2014 at 3:01 PM

Jennifer & Ann,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) Based on your revised Location Drawing, I have updated the Cultural Distance section so that the distance match each other. The nearest Building is 399 feet, the nearest Building Unit is 581 feet, the nearest above ground utility is 718 feet, and the nearest property line is 168 feet.
- 2) In the Water Resources section you have indicated this oil and gas location is not a Sensitive Area. Due to the proximity of a nearby surface waters that will be close to the production facilities, I would like to change the Sensitive Area designation to YES.
- 3) Due to the proximity of an irrigation ditch and canal to the wells and/or production facilities on this location, I would like to add the following Condition of Approval:  
"Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the irrigation ditch located 370 feet east and the Greeley No. 2 Ditch canal located 130 feet west of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."
- 4) While you have included several Best Management Practices (BMPs) concerning the drilling, construction, and operation of this oil and gas location, you have also identified this location to be within the Buffer Zone of the nearest Building Unit (581 feet). Therefore, please provide **site specific** BMPs addressing the following additional mitigation measures:  
Rule 604.c.(2)C - Green Completions Emission Control Systems  
Rule 604.c.(2)F - Leak Detection Plan  
Rule 604.c.(2)G - Berm Construction  
Rule 604.c.(2)H - Blowout Preventer Equipment  
Rule 604.c.(2)N - Control of Fire Hazards  
Rule 604.c.(2)R - Tank Specifications  
Rule 804 - Visual Impact Mitigation  
Rule 805 - Odors and Dust

Please respond to this correspondence with the requested items by May 30, 2014. If you have any questions, please feel free to contact me. Thank you.

[Quoted text hidden]

—

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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**Jennifer Grosshans** <[jgrosshans@petro-fs.com](mailto:jgrosshans@petro-fs.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>  
Cc: Ann Stephens <[astephens@petro-fs.com](mailto:astephens@petro-fs.com)>

Tue, May 6, 2014 at 8:04 AM

Please see my responses in red below.

Truly,

Jennifer Grosshans

Regulatory Technician

[Petroleum Field Services LLC](#)

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**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Wednesday, April 30, 2014 3:01 PM  
**To:** Jennifer Grosshans  
**Cc:** Ann Stephens  
**Subject:** Re: COGCC Form 2A review of Bayswater Exploration's Holton 31-12 Pad - Doc #400591342

Jennifer & Ann,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Based on your revised Location Drawing, I have updated the Cultural Distance section so that the distance match each other. The nearest Building is 399 feet, the nearest Building Unit is 581 feet, the nearest above ground utility is 718 feet, and the nearest property line is 168 feet. **THIS IS FINE**

2) In the Water Resources section you have indicated this oil and gas location is not a Sensitive Area. Due to the proximity of a nearby surface waters that will be close to the production facilities, I would like to change the Sensitive Area designation to YES. **THIS IS FINE**

3) Due to the proximity of an irrigation ditch and canal to the wells and/or production facilities on this location, I would like to add the following Condition of Approval:

"Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the irrigation ditch located 370 feet east and the Greeley No. 2 Ditch canal located 130 feet west of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products." **I am not sure where you are receiving the information that the "Greeley No. 2 Ditch canal located 130 feet west of the oil and gas location." On our location drawing shows that the canal is 397 feet to the west of the reference location. Please advise.**

4) While you have included several Best Management Practices (BMPs) concerning the drilling, construction, and operation of this oil and gas location, you have also identified this location to be within the Buffer Zone of the nearest Building Unit (581 feet). Therefore, please provide **site specific** BMPs addressing the following additional mitigation measures:

#### Rule 604.c.(2)C - Green Completions Emission Control Systems

**Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completions techniques pursuant to COGCC Rules. In the anticipated absence of a viable gas sales line, the flowback gas shall be thermally oxidized in an emissions control device (ECD), which will be installed and kept in operable condition for least the first 90-days of production pursuant to CDPHE rules. This ECD shall have an adequate capacity for 1.5 times the largest flowback within a 10 mile radius, will be flanged to route gas to other or permanent oxidizing equipment and shall be provided with the equipment needed to maintain combustions where non-combustible gases are present.**

#### Rule 604.c.(2)F - Leak Detection Plan

**Pumper will visit the location daily and visually inspect all tanks and fittings for leaks. Additionally, monthly documented SPCCP inspections are conducted pursuant to 40 CFR 112.**

#### Rule 604.c.(2)G - Berm Construction

**Tanks berms shall be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. All berms will be visually checked periodically to ensure proper working condition.**

#### Rule 604.c.(2)H - Blowout Preventer Equipment

**A double ram and annular preventer will be used during drilling. Stabbing valves shall be installed in the event of reverse circulation and shall be prior tested with low and high pressure fluid.**

#### Rule 604.c.(2)N - Control of Fire Hazards

**All material that is considered a fire hazard shall be a minimum of 25' from the wellhead tanks or separators. Electrical equipment shall comply with API IRP 500 and will comply with the current national electrical code.**

#### Rule 604.c.(2)R - Tank Specifications

**Tanks will be designed, constructed and maintained in accordance with NFPA Code 30. The tanks are visually inspected once a day for issues, and recorded inspections are conducted once a month.**

#### Rule 804 - Visual Impact Mitigation

**All long term facility structures will be painted a color that enables the facilities to blend in with the natural background color of the landscape, as seen from a viewing distance and location typically used by the public. Maintain appearance with garbage clean-up; a trash bin will be located on site to accumulate waste by the personnel drilling the wells. Site will have unused equipment, trash and junk removed immediately.**

#### Rule 805 - Odors and Dust

**Bayswater will regulate odors in accordance with COGCC Rule 805. The production facilities will have VOC Combustors with emission control devices to comply with the Department of Public Health and**

**Environment, Air Quality Control Commission. Traffic dust control will be done using water on all county roads leading up to the pad site.**

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[Quoted text hidden]

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**Andrews - DNR, Doug** <doug.andrews@state.co.us>

Wed, May 7, 2014 at 9:32 AM

To: Jennifer Grosshans <jgrosshans@petro-fs.com>

Cc: Ann Stephens <astephens@petro-fs.com>

Jennifer,

My apologies on indicating the Greeley No. 2 Ditch canal being 130 feet west of the location. The distance of 130 feet was a typo on my part. I should have written that COA to indicate it being 397 feet as is shown on your Location Drawing and Hydrology Map. My primary goal with this COA is to be protective of the two nearest surface water features from possible spills and releases.

Thank you for the additional BMPs. I apologize for not being more clear in what I was looking for with a site specific BMP for Rule 805 Odors and Dust. The mitigation of odors looks good and while you have addressed dust control on the county roads leading up to the pad site, I'm concerned with Rule 805.c. - Fugitive Dust. Specifically, a site specific BMP on dust control in regards to Bayswater's operations on the location including silica dust controls when handling frac sands.

[Quoted text hidden]

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**Ann Stephens** <astephens@petro-fs.com>

Wed, May 7, 2014 at 12:26 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Jennifer Grosshans <jgrosshans@petro-fs.com>

Doug,

And my apologies for not addressing the fugitive dust.

Please review the following language and add to the Rule 805 BMP, if sufficient:

Fugitive dust will be controlled by speed restrictions on all neighboring roads, regular road maintenance and repair, and avoiding construction activity during high wind days. If technologically and economically feasible, additional management practices may also be required to minimize fugitive dust, as well as to control silica dust while handling sand during frac'ing operations.

Please advise should you have any questions. Many thanks for your patience.

Respectfully,

**Ann Stephens**

**Regulatory Manager**

Petroleum Field Services, LLC

7535 Hilltop Circle

Denver, Colorado 80221

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Fax: 303-218-5678



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**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]

**Sent:** Wednesday, May 07, 2014 9:33 AM

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