

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]
Sent: Friday, May 16, 2014 2:04 PM
To: Matt Lepore - DNR
Subject: Fwd: Tabula Andreatta 3 APD and OGLA

Matt,

A length correspondence follows below, but I need your acceptance of the changed language because the COA was critical to your initial approval of the Variance Request.

Here is a summary, so you don't have to read the whole e-mail (the critical ones are the early short ones from back in March):

1. Tabula Rasa applied for 2 permits to expand Oil and Gas Locations and twin two existing CO2 wells in Huerfano County in September 2013.
2. A Move-On.org petition was circulated in objection and requesting a public meeting. Public comment was extended, and CDPHE consulted.
3. One location (the Andreatta 3) was determined to need a variance from the new safety setback of 200' to a power line. COGCC visited the Locations.
4. COGCC met with the operator and they requested we move forward with review of Caddell Location but requested time to decide whether they would pursue the Andreatta with a variance or withdraw the application, the Andreatta was put On Hold.
5. Operator decided to move forward with Andreatta with variance request. From 2/12/14 to 3/13/14, COGCC and Operator worked to achieve satisfactory conditions and obtained Director approval for the variance with conditions applied.
6. COGCC prepared to approve Form 2A, but found unresolved issues. COGCC staff reported variance approved (March staff report).
7. On 3/26/14 operator requested change to COA language (below correspondence); COGCC requested operator provide the revised language for proposal to Director. Operator provided unrelated (but required) information, but did not provide alternative language.
8. 5/12/14 Operator requested status update. COGCC notes that we were expecting BMP language from them and some other information.
9. Operator has completed request.

The original COA was written:

As a condition of approval to the variance requested to reduce the safety setback to the overhead utility (Rule 603.a.(1)), Operator shall temporarily de-energize the overhead power lines to the north of the Oil and Gas Location that feed the gas plant during Rig Move In, Rig Up (MIRU) and during rigging down operations for their drill rig.

Operator is proposing:

The power line that is within 200' of the location will be shut in only while stabilizing the mast during rigging up and rigging down and securing all guide wires. Tabula Rasa will not be required to shut in the power when moving equipment in and out of the location.

I have no issue with this change, and would recommend accepting it.