

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

**COGCC Form 2A review of PDC Energy's Chesnut 27G-HZ Pad location - Doc #400589287**

3 messages

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

Mon, Aug 4, 2014 at 1:59 PM

To: Liz Lindow &lt;liz.lindow@pdce.com&gt;, Julie Webb &lt;julie.webb@pdce.com&gt;, Shayelyn.Marshall@pdce.com, Kaitlin.Buck@pdce.com

Cc: John Noto - DNR &lt;john.noto@state.co.us&gt;

Liz, Julie, Shayelyn, &amp; Kaitlin,

I have completed my review of the Form 2A Oil and Gas Location Assessment for the referenced location and I have a few comment.

1) Based on a telephone conversation with Kaitlin this morning, the wells for nearby Chestnut 27K-HZ Pad (Form 2A Doc #400589365) will be produced to this oil and gas location. Therefore, I will update the Related Remote Locations section to indicate that.

2) In the Land Use section you have indicated Rangeland. However, the adjacent Chestnut 27GK-HZ Pad and Chestnut 27K-HZ Pad list a land use of Improved Pasture. From aerial photos and your Location Pictures, the land use appears the same among all three. Please explain why the land use is different for this oil and gas location.

3) Because you have indicated the nearest Building Unit is 404 feet away, this proposed oil and gas location is within an Exception Zone. Therefore, I will check this box in the Cultural Distance section.

4) Because this proposed oil and gas location is within a 1,000 feet of a Building Unit, per COGCC Rule 303.b.(3)J, a scaled Facility Layout Drawing depicting the location of all existing and proposed new Oil and Gas Facilities listed on the Form 2A shall be attached. Please provide me a scaled Facility Layout Drawing that depicts all the facilities listed on this Form 2A.

5) As I mentioned in a previous email correspondence for this location, there is no provision in our Rules for a Building Unit owner to waive your requirement to address the mitigation measures in Rule 604.c. Only an approved 502.b. Variance will allow you to not address the mitigation measures at all. Many of the mitigation measures in Rule 604.c. are geared to eliminate, minimize or mitigate potential adverse impacts to public health, safety, welfare, the environment, and wildlife beyond what Building Unit owners are typically concerned with (noise, lights, dust, etc.).

Some examples of these are:

Rule 604.c.(2)C - Green Completions,  
D - Traffic Plan,  
F - Leak Detection Plan,  
G - Berm Construction,  
H - Blowout preventer equipment,  
M - Fencing requirements,  
N - Control of fire hazards,  
P - Removal of surface trash,  
R - Tank specifications, and  
S - Access Roads.

Also, because this location is within an Exception Zone there are additional mitigation measure

requirements for berm construction including tertiary containment (see Rule 604.c.(3)) that are protective of nearby surface water bodies. Additionally, a mitigation measure BMP for Noise that indicates no special site specific noise control mitigation measures will be implemented because the Building Unit owner is not concerned with noise impacts is still required. The same goes for lighting, visual impact mitigation, odors, and fugitive dust control.

Please respond to this correspondence by September 4, 2014. If you have any questions, please contact me.

—

*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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**Liz Lindow** <[Liz.Lindow@pdce.com](mailto:Liz.Lindow@pdce.com)>

Tue, Aug 12, 2014 at 4:15 PM


To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Cc: John Noto - DNR <[john.noto@state.co.us](mailto:john.noto@state.co.us)>, Julie Webb <[Julie.Webb@pdce.com](mailto:Julie.Webb@pdce.com)>, Shayelyn Marshall <[Shayelyn.Marshall@pdce.com](mailto:Shayelyn.Marshall@pdce.com)>, Kaitlin Buck <[Kaitlin.Buck@pdce.com](mailto:Kaitlin.Buck@pdce.com)>

Hi Doug,

Please see my answers below in **RED**. I am still waiting on the scaled facility drawing but will pass it along as soon as I have it.

Thanks,  
Liz

 Liz Lindow | Regulatory Analyst (Progressive Consulting) | Consultant for PDC Energy | O: 303-831-3974 | F: 303-860-5838 | [liz.lindow@pdce.com](mailto:liz.lindow@pdce.com)

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

**Sent:** Monday, August 04, 2014 2:00 PM

**To:** Liz Lindow; Julie Webb; Shayelyn Marshall; Kaitlin Buck

**Cc:** John Noto - DNR

**Subject:** COGCC Form 2A review of PDC Energy's Chesnut 27G-HZ Pad location - Doc #400589287

Liz, Julie, Shayelyn, & Kaitlin,

I have completed my review of the Form 2A Oil and Gas Location Assessment for the referenced location and I have a few comment.

1) Based on a telephone conversation with Kaitlin this morning, the wells for nearby Chestnut 27K-HZ Pad (Form 2A Doc #400589365) will be produced to this oil and gas location. Therefore, I will update the Related Remote Locations section to indicate that. **APPROVED**

2) In the Land Use section you have indicated Rangeland. However, the adjacent Chestnut 27GK-HZ Pad and Chestnut 27K-HZ Pad list a land use of Improved Pasture. From aerial photos and your Location Pictures, the land use appears the same among all three. Please explain why the land use is different for this oil and gas location. **PLEASE USE RANGELAND AS THE LAND USE.**

3) Because you have indicated the nearest Building Unit is 404 feet away, this proposed oil and gas location is within an Exception Zone. Therefore, I will check this box in the Cultural Distance section. **APPROVED**

4) Because this proposed oil and gas location is within a 1,000 feet of a Building Unit, per COGCC Rule 303.b.(3)J, a scaled Facility Layout Drawing depicting the location of all existing and proposed new Oil and Gas Facilities listed on the Form 2A shall be attached. Please provide me a scaled Facility Layout Drawing that depicts all the facilities listed on this Form 2A. **STILL WORKING ON GETTING THIS FROM SURVEYOR, WILL SEND AS SOON AS I RECEIVE IT.**

5) As I mentioned in a previous email correspondence for this location, there is no provision in our Rules for a Building Unit owner to waive your requirement to address the mitigation measures in Rule 604.c. Only an approved 502.b. Variance will allow you to not address the mitigation measures at all. Many of the mitigation measures in Rule 604.c. are geared to eliminate, minimize or mitigate potential adverse impacts to public health, safety, welfare, the environment, and wildlife beyond what Building Unit owners are typically concerned with (noise, lights, dust, etc.). Some examples of these are:

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Also, because this location is within an Exception Zone there are additional mitigation measure requirements for berm construction including tertiary containment (see Rule 604.c.(3)) that are protective of nearby surface water bodies. Additionally, a mitigation measure BMP for Noise that indicates no special site specific noise control mitigation measures will be implemented because the Building Unit owner is not concerned with noise impacts is still required. The same goes for lighting, visual impact mitigation, odors, and fugitive dust control. **SEE ATTACHED BMPS.**

Please respond to this correspondence by September 4, 2014. If you have any questions, please contact me.

--

*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



**Chesnut 27G-HZ Pad\_Final BMPs.pdf**  
96K

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**Liz Lindow** <Liz.Lindow@pdce.com>

Thu, Aug 14, 2014 at 8:06 AM

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

Cc: John Noto - DNR <john.noto@state.co.us>, Julie Webb <Julie.Webb@pdce.com>, Shayelyn Marshall <Shayelyn.Marshall@pdce.com>, Kaitlin Buck <Kaitlin.Buck@pdce.com>

Hi Doug - here is the scaled facility drawing for this pad. Thank you!

Liz Lindow, Regulatory Analyst

PDC Energy

1775 Sherman Street, Suite 3000, Denver, CO 80203

Office: [303-831-3974](tel:303-831-3974) | Fax: [303-860-5838](tel:303-860-5838) | Cell: [303-590-8789](tel:303-590-8789) | [liz.lindow@pdce.com](mailto:liz.lindow@pdce.com)

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**From:** Liz Lindow

**Sent:** Tuesday, August 12, 2014 4:15 PM

**To:** Andrews - DNR, Doug

**Cc:** John Noto - DNR; Julie Webb; Shayelyn Marshall; Kaitlin Buck

**Subject:** RE: COGCC Form 2A review of PDC Energy's Chesnut 27G-HZ Pad location - Doc #400589287

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**SCALED FACILITY\_CHESNUT 27G-HZ (2014-08-14).pdf**  
491K