

FORM  
2A

Rev  
08/13

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

400680321

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Date Received:

09/08/2014

Oil and Gas Location Assessment

☐ New Location ☐ Refile ☒ Amend Existing Location Location#: 306149

Submit signed original form. This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**306149**

Expiration Date:

**12/10/2017**

☒ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10110  
Name: GREAT WESTERN OPERATING COMPANY LLC  
Address: 1801 BROADWAY #500  
City: DENVER State: CO Zip: 80202

Contact Information

Name: Callie Fiddes  
Phone: (303) 398-0550  
Fax: ( )  
email: regulatorypermitting@gwogco.com

RECLAMATION FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID: 20090080 ☐ Gas Facility Surety ID: \_\_\_\_\_  
☐ Waste Management Surety ID: \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Kodak South FD Pad Number: 25-202HC  
County: WELD  
QuarterQuarter: SESW Section: 26 Township: 6N Range: 67W Meridian: 6 Ground Elevation: 4743  
Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.  
Footage at surface: 727 feet FSL from North or South section line  
1640 feet FWL from East or West section line  
Latitude: 40.452692 Longitude: -104.864453  
PDOP Reading: 1.6 Date of Measurement: 10/18/2013  
Instrument Operator's Name: Loren Shanks

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:

LOCATION ID # FORM 2A DOC #

## FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	<u>15</u>	Oil Tanks*	<u>28</u>	Condensate Tanks*	<u>      </u>	Water Tanks*	<u>4</u>	Buried Produced Water Vaults*	<u>      </u>
Drilling Pits	<u>      </u>	Production Pits*	<u>      </u>	Special Purpose Pits	<u>      </u>	Multi-Well Pits*	<u>      </u>	Modular Large Volume Tanks	<u>2</u>
Pump Jacks	<u>      </u>	Separators*	<u>16</u>	Injection Pumps*	<u>      </u>	Cavity Pumps*	<u>      </u>	Gas Compressors*	<u>1</u>
Gas or Diesel Motors*	<u>      </u>	Electric Motors	<u>      </u>	Electric Generators*	<u>      </u>	Fuel Tanks*	<u>      </u>	LACT Unit*	<u>      </u>
Dehydrator Units*	<u>      </u>	Vapor Recovery Unit*	<u>2</u>	VOC Combustor*	<u>      </u>	Flare*	<u>      </u>	Pigging Station*	<u>      </u>

## OTHER FACILITIES\*

Other Facility Type

Number

ECD

8

\*Those facilities indicated by an asterisk (\*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

14 – 3" steel line  
16 - 3" steel oil line  
16 – 3" steel vent line  
2 – 3" steel return gas line  
2 – 3" poly pipe

## CONSTRUCTION

Date planned to commence construction: 08/01/2015 Size of disturbed area during construction in acres: 10.22

Estimated date that interim reclamation will begin: 12/01/2015 Size of location after interim reclamation in acres: 5.88

Estimated post-construction ground elevation: 4742

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE

Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

Centralized E&P Waste Management Facility ID, if applicable: \_\_\_\_\_

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Windsor Renewal I, LLC

Phone: \_\_\_\_\_

Address: 252 Clayton St. 4th floor

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

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

City: Denver State: CO Zip: 80206

Surface Owner: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check all that apply. The Surface Owner: ☐ is the mineral owner

☐ is committed to an oil and Gas Lease

☐ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

Date of Rule 306 surface owner consultation 11/14/2013

## CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☒ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): \_\_\_\_\_

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Future Land Use (Check all that apply):

Crop Land: ☒ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): \_\_\_\_\_

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

## CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	294 Feet	103 Feet
Building Unit:	519 Feet	248 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	396 Feet	379 Feet
Above Ground Utility:	781 Feet	509 Feet
Railroad:	876 Feet	542 Feet
Property Line:	595 Feet	489 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(\*) on the Facilities Tab.

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: ☒ Buffer Zone  
☒ Exception Zone  
☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 11/11/2013

## FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- ☒ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (onll or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- ☒ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

The area is surrounded by industrial buildings, most of which are owned by Great Western or sister companies. Placement of production facilities considered adequate on any side of the pad.

## SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 41-Nunn clay loam, 0 to 1 percent slopes

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

## PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☐

Plant species from: ☐ NRCS or, ☐ field observation Date of observation: \_\_\_\_\_

List individual species: \_\_\_\_\_

### Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- ☐ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- ☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- ☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- ☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- ☐ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- ☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- ☐ Alpine (above timberline)
- ☐ Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area: ☐ No ☒ Yes

Distance to nearest

downgradient surface water feature: 717 Feet

water well: 403 Feet

Estimated depth to ground water at Oil and Gas Location 10 Feet

Basis for depth to groundwater and sensitive area determination:

The closest water well is approximately 403' away but the closest one with static water level listed has the following info:  
Receipt: 0546795A  
Permit #: 267217- -

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No  
zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## RULE 502.b VARIANCE REQUEST

☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments

The 30-day pre-application notification for Carestream Health Inc. has been attached. Broe Land Acquisitions and Windsor Renewal are both subsidiaries of Great Western and their/our notifications were hand delivered.

The manufacturer of the MLVTs is Brewer Steel Company. The size of the MLVTs is 40,000 BBLs. The anticipated time frame the MLVTs will be onsite is two weeks.

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

Signed: \_\_\_\_\_ Date: 09/08/2014 Email: regulatorypermitting@gwogco.com

Print Name: Callie Fiddes Title: Regulatory Tech

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:  Director of COGCC Date: 12/11/2014

## Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

### COA Type

### Description

	Operator shall provide notice to COGCC 48 hours prior to commencing construction of this Oil and Gas Location via Form 42.
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## Best Management Practices

### No BMP/COA Type

### Description

1	Planning	GWOC is utilizing a Closed Loop Drilling System on the subject facility. No open pit storage of water is foreseen for this facility. If open pit storage of fresh water is required, a Form 15 will be submitted and approved prior to use of such pit, and appropriate signage and escape provisions will be provided as required. Cuttings and drilling fluids will be removed from location and properly treated or disposed of according to applicable regulations.
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2	Planning	<p>As applicable, per COGCC Rule 805, GWOC will utilize all reasonable and cost-efficient best practices, including but not limited to those listed in Rule 805, to maximize resource recovery and mitigate releases to the environment.</p> <ul style="list-style-type: none"> <li>• Initial frac and drillout effluent is routed through a sand catcher/trap and a junk/sand tank to remove sand and well frac debris.</li> <li>• Once any hydrocarbons are detected but prior to encountering salable quality combustible gas or significant volumes of liquid hydrocarbons (condensate or oil) (greater than 10 barrels per day average) the effluent is routed through a high-pressure separator and closed-top tanks to minimize emissions to the environment. Hydrocarbon liquids, produced water, and sand are separated utilizing the high-pressure separator.</li> <li>• Any accumulation of liquid hydrocarbons on the surface of a tank, greater than a residual amount (maximum of 20 barrels) will be removed as soon as practicable but within a maximum of 24 hours in all cases. The quality (combustibility) of the gas is typically monitored directly at the high-pressure separator. When salable (combustible) quality gas is measured/detected the gas stream is immediately diverted to the sales pipeline or the well is shut in.</li> <li>• Venting or flaring of combustible gases is not performed except in rare 'upset' type situations for safety reasons.</li> <li>• The separated produced water and hydrocarbon liquids (condensate/oil) are directed to specific tanks for storage until being unloaded and hauled to disposal or sales as appropriate.</li> </ul>
3	Planning	<p>GWOC strives to utilize multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. Multi-well pads are not always feasible due to numerous possible issues including but not limited to; landowner requirements, topographic constraints, well bore reaches, setback requirements, etc. This pad will be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping. The pad has all weather access roads to allow for operator and emergency response. This pad has been placed as far as possible from building units.</p>
4	Planning	<p>A BOPE with a minimum pressure rating of 3,000 psi will be utilized. At a minimum it will consist of 2 ram preventers and 1 annular preventer. The blind rams will be positioned below the pipe rams. A backup system of pressure control will be onsite consisting of at a minimum 1,000 psi accumulator (backup pressure). Accumulator is tested to 1,000 psi. Operator may use fixed sized pipe rams matching the tubular size. The annular preventer will be pressure tested to 250 psi low and 2,000 psi high for 10 minutes each. The ram preventers will be tested to 250 psi low and 2,500 psi high for 10 minutes each. All remaining well control equipment will be tested to 250 psi low and 2,500 psi high for 10 minutes each. The pressure tests will be conducted when the equipment is first installed and every 30 days thereafter. Pipe rams and blind rams will be function tested before every well service operation. Annual BOP inspections and pressure tests will be performed by the service company and will be charted &amp; retained for 1 year. Backup stabbing valves shall be used on operations that require reverse circulation. Valves will be pressure tested before each well service operation in low pressure and high pressure range. The GWOC onsite representative will be certified in Well Control Operations by a Well-Cap certified training service.</p>
5	Planning	<p>GWOC does not typically utilize pits in any of its operations. If a pit was to be used proper pit Level indicators would be installed to indicate pit levels and compliance with pit volume rules.</p>
6	Planning	<p>Conventional drill stem tests will not be conducted on DJ Basin horizontal wells currently being executed or planned by GWOC. If plans change in the future a well specific drill stem testing plan will be prepared for that particular well. Note that GWOC may elect to use one of several available wireline deployed tools for the purpose of measuring downhole formation pressures and/or collecting downhole fluid samples from the target formation(s) of a particular well.</p>
7	Planning	<p>GWOC shall identify the location of the P&amp;A wellbore with a permanent monument as specified in Rule 319.a.(5). The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument. P&amp;A wellbores shall be cutoff well below ground surface in agricultural areas to provide for landowners to safely farm the reclaimed well area.</p>

8	Planning	Where possible, GWOC shall provide for the development of multiple reservoirs by drilling on existing pads. GWOC strives to utilize multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. Multi-well pads are not always feasible due to numerous possible issues including but not limited to; landowner requirements, topographic constraints, well bore reaches, setback requirements, etc.
9	Traffic control	GWOC works closely with all municipalities as appropriate to develop a mutually acceptable road traffic access plan addressing site specific traffic-related issues. These plans may address issues such as; routes, construction specification of access roads, maintenance, dust control, jake brake limits, traffic controls, enforcement, emergency response, etc. GWOC will work with municipalities, the County's Planning Department and/or Road Department to address complaints related to traffic or dust issues as appropriate. Dust control measures may include surface stabilization, or dust control with appropriate chemical or water applications.
10	Traffic control	All access roads are designed, constructed, and maintained such that heavy equipment, including emergency response vehicles, can readily access and exit the location. In addition, GWOC will implement manual mud mitigation measures (eg. tracking control rock aprons) at location exits onto paved roads as necessary and in conjunction with county requirements.
11	General Housekeeping	General housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with storm water runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup will consist of patrolling the roadways, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly and promptly.
12	General Housekeeping	All surface debris, trash, unusable scrap, or solid waste from the facility will be properly temporarily stored on location in a secure container and ultimately removed and disposed of in a legal manner.
13	General Housekeeping	Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.
14	Storm Water/Erosion Control	Storm Water Management Plans (SWMP) are in place to address construction, drilling and operations associated with Oil and Gas development throughout the state of Colorado in accordance with Colorado Department of Public Health and Environment (CDPHE). BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. BMP's used will vary according to the location, and will remain in place until the pad reaches final reclamation.
15	Material Handling and Spill Prevention	Spill Prevention Control and Countermeasures (SPCC) plans are in place to address any possible spills associated with Oil and Gas operations throughout the state of Colorado in accordance with CFR 112. In accordance with COGCC Rule 1002.f.(2)A. & B., shall provide a designated storage area for dry bulk chemicals and miscellaneous fluids. The storage area shall be covered to prevent contact of precipitation with chemicals, shall be elevated above storm- or standing water, and shall provide sufficient containment to prevent release of spilled fluids or chemicals from impacting soil, surface water or groundwater and will prevent the co-mingling of spilled fluids or chemicals with other E & P Waste.



16	Construction	GWOC designs its new facilities to both avoid leaks or releases as well as to help detect them in a time-efficient manner to minimize potential impacts. Oil and produced water storage tanks are in secondary containment areas. A minimum containment capacity of 110% of the single largest storage vessel inside the containment is constructed around any storage area. Tanks and all visible pipelines and valves etc. are inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures. In addition, our company lease operators and Production staff review production records, including volumes and pressures, looking for irregularities that may indicate a problem with a tank or pipeline. If an irregularity is detected that may indicate a potential release the suspect tank and/or pipeline(s) are removed from service, isolated, and either pressure tested or visibly inspected for indications of a potential leak.
17	Construction	<p>A minimum containment capacity of 110% of the single largest storage vessel inside the containment will be constructed around any liquids storage area. For this location, steel containment with sealed liners will be utilized at all storage facilities on this location.</p> <p>Tanks and all visible pipelines and valves etc. will be inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures.</p>
18	Construction	At a minimum GWOC installs appropriate fencing to restrict access by any unauthorized persons. This fencing may vary depending on site-specific situations. Fencing will be properly noted on facility layout diagrams for both drilling/completion and the production phases of operations.
19	Construction	GWOC constructs and operates our facilities to meet state and API codes, as appropriate, including API RP 500 electrical classifications inside bermed areas. Any unused potentially flammable materials are moved a minimum distance of 25-feet from wellhead, tanks, and separator areas. In addition, GWOC implements a Hot Work Permit Program for employees and contractors doing any defined 'Hot Work' activities on GWOC locations.
20	Construction	Load line containment is a necessary part of a complete secondary containment system. All loadlines are capped or bullplugged or locked shut to reduce the likelihood of a release occurring. In addition, GWOC places all load line receivers/valves inside secondary containment areas or in a proper load line containment device or both.
21	Construction	Guy line anchors left buried for future use shall be identified by a brightly colored marker at least 4-feet in height and within 1-foot to the east of the anchor.
22	Construction	All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). GWOC shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director. Only the 2008 version of NFPA Code 30 applies to this rule.
23	Construction	Great Western Operating Company certifies that the MLVTs on this location will be designed and implemented consistent with the COGCC Policy on the use of MLVTs in the state of Colorado.
24	Noise mitigation	Noise levels will be maintained at levels not to exceed COGCC specifications currently in existence, measured at a point 350' from the noise source, or as defined by current COGCC regulations. Where possible, drilling rig engine exhaust will be vented away from occupied buildings. Light sources will likewise be directed downwards, and away from occupied structures where possible. No special noise mitigation efforts should be required at this site. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.

25	Noise mitigation	The subject Great Western Operating Company, L.L.C. (GWOC) location will operate in accordance with maximum permissible noise levels per COGCC Rule 604.c.(2)A. and 802, as applicable. GWOC will utilize reasonable and cost-effective best practices to endeavor to reduce noise levels below these limits in areas where occupied structures occur within a Designated Setback Zone. Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist with noise mitigation. No noise compliance issues are expected from the production area.
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Total: 25 comment(s)

### **Attachment Check List**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
2477445	CORRESPONDENCE
2477468	RULE 306.E. CERTIFICATION
400680321	FORM 2A SUBMITTED
400680348	ACCESS ROAD MAP
400680350	CONST. LAYOUT DRAWINGS
400680351	HYDROLOGY MAP
400680354	LOCATION PICTURES
400680355	FACILITY LAYOUT DRAWING
400680356	MULTI-WELL PLAN
400680358	TOPO MAP
400680359	SURFACE AGRMT/SURETY
400680360	WASTE MANAGEMENT PLAN
400680373	NRCS MAP UNIT DESC
400689124	30 DAY NOTICE LETTER
400698498	LOCATION DRAWING

Total Attach: 15 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>
Permit	Final Review Completed. Operator acknowledges LGD comment; no public comment received.	12/8/2014 8:41:15 AM
OGLA	Operator provided Rule 306.e. Certification and additional information concerning the MLVTs. OGLA task passed.	12/3/2014 8:43:36 AM
OGLA	IN PROCESS - Operator agreed to change this from a New Location to an Amended Location, update the Facilities list, and revise distance from nearest well to nearest Above Ground Utility and also nearest Property Line. OGLA review complete. Waiting on Public Comment period.	11/21/2014 9:47:32 AM
OGLA	ON HOLD - Requested change from New Location to Amend Existing Location ID #306149, update Facilities list to include the existing GWOG well, and revise distance from well to nearest Above Ground Utility. Due by 12/19/14.	11/19/2014 8:08:01 AM
Public	mmm nmnnn mmmm	11/7/2014 11:00:56 AM
LGD	Please be advised that the subject property is located within the Town's Growth Management Area (GMA). The Town's Comprehensive Plan states, "The GMA is intended to define those specific areas within the planning area where it is most logical to extend urban services in the near term, that is, within the next five to ten	11/6/2014 4:20:54 PM

years.”

Below please find the conditions of approval that are typically applied to conditional use grants for oil and gas operations located within Town. Therefore, the Town recommends the following conditions be placed on the subject oil and gas facilities:

1. Prior to the commencement of drilling, the applicant shall submit comprehensive “Drilling and Site Improvement Plans” for review and approval by the Town. Such plans shall address initial drilling activities, initial installation of site improvements and details, and on-going perpetual maintenance of the subject site including, but not limited to, the following:

a. Site access plan. The Drilling and Site Improvement Plans and supplemental information shall address site access points and haul routes for review and approval.

b. Public street clean-up and tracking prevention. The Drilling and Site Improvement Plans and supplemental information shall include a tracking pad for review and approval.

c. Site grading. The Drilling and Site Improvement Plans and supplemental information shall address site grading, including any earth berms for emergency containment.

d. Site lighting. The Drilling and Site Improvement Plans and supplemental information shall include details regarding site lighting fixtures and locations. Security and other site lighting shall utilize full cutoff light fixtures to mitigate light pollution.

e. Temporary screening. The applicant shall install a buffer to screen the initial drilling activities and installation of site improvements from surrounding neighborhoods and streets. The temporary buffer shall include hay bales to enclose the drilling operations to provide noise mitigation.

f. Permanent screening. Given the close proximity to residential neighbors, the Drilling and Site Improvement Plans shall depict proposed long-term screening materials including landscaping, earth berms and any other screening methods to mitigate visual impacts.

g. Fencing. The Drilling and Site Improvement Plans shall depict fencing of the perimeter of the site. Fencing materials shall be reviewed for approval by the Town based upon the character of the surrounding neighborhood.

h. Oil and gas equipment.

(1) The applicant shall utilize electric motors in order to mitigate the noise impacts to the neighboring properties.

(2) The applicant shall ensure that the wells and tanks are of the minimum size required to satisfy present and future functional requirements to mitigate visual impacts.

(3) Low profile tanks shall be utilized and shall be installed in the least visible manner possible.

(4) All tanks and equipment shall be painted to blend-in with the surrounding landscape.

i. Air quality.

(1) The applicant shall participate in any required Environmental Protection Agency (EPA) air quality monitoring and/or testing by allowing EPA to install equipment on site for said monitoring and testing.

(2) The applicant shall install and operate an emissions control device (ECD) capable of reducing Volatile Organic Compound (VOC) emissions on the subject oil

	<p>and gas equipment in accordance with Colorado Oil and Gas Conservation Commission (COGCC) and/or the Colorado Department of Public Health and Environment (CDPHE) rules and regulations.</p> <p>(3)The applicant shall submit to the Town copies of all air emissions reporting as required by the COGCC and/or the CDPHE's Air Pollution Control Division.</p> <p>j. Water quality.</p> <p>(1)The applicant shall ensure that any hydrocarbon discharges from the site comply with all state and federal water quality requirements.</p> <p>(2)The applicant shall provide test results from Groundwater Baseline Sampling and Monitoring required by COGCC Rule 318A.e(4) to the Town. (condition updated 10/28/13 to reflect updated COGCC rule)</p> <p>k. Emergency containment. The secondary containment berm surrounding all storage vessels shall be designed and constructed to contain a minimum of 110% of the volume of the largest vessel located within the containment area or to State of Colorado standards, whichever requirements are more stringent.</p> <p>l. Waste disposal. The applicant shall submit to the Town copies of all waste management reports as required by the COGCC and/or the CDPHE rules and regulations.</p> <p>m. The following certification blocks shall be included on the Drilling and Site Improvement Plans:</p> <p>(1) A signed owner's acknowledgement certification block.</p> <p>(2) A signed drilling operator's acknowledgement certification block.</p> <p>n. The following notes shall be included on the Drilling and Site Improvement Plans:</p> <p>(1) The applicant shall comply with all rules and regulations of the Colorado Oil and Gas Conservation Commission (COGCC).</p> <p>(2) The applicant shall comply with all rules and regulations of the Colorado Department of Public Health and Environment (CDPHE).</p> <p>(3) The applicant shall maintain on-going compliance with all conditions of the Town and Windsor-Severance Fire Rescue.</p> <p>(4) The facilities shall be kept clean and otherwise properly maintained at all times.</p> <p>(5) The existing access may be utilized for oil and gas well activities. This access point is temporary and will be required to be removed at such time that permanent access is available in the future.</p> <p>2. The applicant shall address and comply with the conditions of Windsor-Severance Fire Rescue.</p> <p>ACCESS COMMENTS:</p> <p>If access to the site is proposed from a Town of Windsor street, such access point (s) shall require approval from the Town of Windsor Engineering Department and any required access improvements, street clean-up, tracking pads, etc., shall be addressed accordingly.</p>		
Permit	Passed Completeness	11/6/2014 10:52:21 AM	
OGLA	Buffer Zone/Exception Zone completeness review passed. Ready for overall Completeness review.	11/6/2014 10:34:51 AM	

Permit	Requested re-review by OGLA.	10/31/2014 10:59:30 AM
OGLA	Buffer Zone/Exception Zone completeness review - Returned to DRAFT status. Need clarification/explanation of cultural distance to nearest Building and Building Unit. Rule 604.c.(2) & 604.c.(3) mitigation measure BMPs to be listed individually on the Operator BMP tab, not included as an Attachment. Rule 604.c.(2)E mitigation measure BMP not specific enough concerning production facility proximity to Building Units.	9/19/2014 10:38:07 AM
Permit	Operator has resubmitted after returning to draft for OGLA issues. Sending to John for re-review.	9/17/2014 7:17:53 AM
OGLA	Buffer Zone/Exception Zone completeness review - cultural distances to nearest building and building unit incorrect, no 305.a.(2) certification attached, 604.c.(2) mitigation measures not adequately addressed. 604.c.(3) not addressed	9/11/2014 3:31:02 PM
Permit	Within Exception Zone, sent to John Noto for further review.	9/10/2014 8:40:23 AM

Total: 13 comment(s)