

STATE OF
COLORADO

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

COGCC Form 2A review of Great Western's BURR FD PAD location - Doc #400708100

4 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
 To: Regulatory Permitting <regulatorypermitting@gwogco.com>
 Cc: Penny Garrison - DNR <penny.garrison@state.co.us>

Tue, Nov 18, 2014 at 9:12 AM

Callie,

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

1) You have indicated that there will be two (2) Modular Large Volume Tanks (MLVTs) on this proposed oil and gas location. Per the COGCC Policy on the use of MLVTs, the following additional information is required on the Form 2A:

- A - The manufacturer or vendor of the MLVTs,
- B - The size/volume of the MLVTs,
- C - The anticipated timeframe the MLVTs will be onsite,
- D - A Location Drawing indicating where the MLVTs will be located with respect to other facility equipment and property boundaries, and
- E - The Operator's certification that the MLVTs will be designed and implemented consistent with the COGCC's policy.

2) A review of your Location Drawing indicates the distance from the nearest well to several features listed in the Cultural Distance section are incorrect. First, the nearby well shed to the east is part of the production facilities of a nearby oil and gas operation and should not be used when determining the distance to the nearest Building. The next nearest Building appears to be a house (Building Unit) located 780 feet south. Therefore from a well it appears the distance to the nearest Building and Building Unit should be changed to 780 feet. Second, I was unable to determine where the High Occupancy Building Unit listed as 3,854 feet from the nearest well is located. Please clarify what this High Occupancy Building Unit is and in what direction. Third, per your Location Drawing the nearest Public Road is 461 feet and the nearest railroad is 1,352 feet. Please approve me revising these distances.

3) A review of your Location Drawing indicates the distance from the nearest production facility to several features listed in the Cultural Distance section appear incorrect. First, the nearby well shed to the east is part of the production facilities of a nearby oil and gas operation and should not be used when determining the distance to the nearest Building. The next nearest Building appears to be a garage associated with the house (Building Unit) to the southeast. The distance to this garage is approximately 510 feet from the nearest production facility. Second, I was unable to determine where the High Occupancy Building Unit listed as 3,992 feet from the nearest well is located. Please clarify what this High Occupancy Building Unit is and in what direction.

4) During my review I observed a pond on aerial photographs that is located approximately 460 feet west of this proposed oil and gas location but it does not appear on your Hydrology Map. This pond appears to be the nearest downgradient surface water feature. Therefore, I would like to change this in the Water Resources section. Please revise your Hydrology Map to show this pond.

5) A review of your Location Drawing indicates it does not show all visible surface improvements that I observed on aerial photographs during my review. In addition to the pond discussed in my Comment #4 above, there also appears to be existing oil and gas production facilities approximately 500 feet to the southwest and above ground utilities to the west that run north south along the existing dirt road and to the south along the south side of County Road 66. Please see the attached aerial photo. Please revise your Location Drawing to show all visible surface improvements within a 500 foot radius of the proposed oil and gas location.

Please respond to this correspondence by December 18, 2014. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801
 Denver, CO 80203
doug.andrews@state.co.us
 303-894-2100 Ext. 5180



GWOG Burr FD Pad aerial.JPG
155K

Regulatory Permitting <regulatorypermitting@gwogco.com>
 To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Hi Doug,

I've gotten with our surveyors we used for this pad and have some adjustments. Here's the MLVT info:

1. The manufacturer of the TLVST is Brewer Steel Company
2. The size of the TLVST is 40,000 BBLs
3. The anticipated time frame the TLVST will be onsite is three weeks.
4. Location drawing attached

5. CERTIFICATION STATEMENT: 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 st

An updated location drawing is attached. The high occupancy building listed is a warehouse to the south west.

The cultural distances now refers to the closest building being a house instead of the well shed on the existing pad to the east. There is still a line indicating the location of the well shed from the reference well head, as it is an improvement within 500 feet of said reference point.

Reference Point	Building			Building Unit			High Occupancy Building Unit			Designated Outside Activity Area		Public Road		Above Ground Utility	
	Structure	Direction	Distance	Structure	Direction	Distance	Structure	Direction	Distance	Direction	Distance	Direction	Distance	Direction	Distance
Production Pad	House	S02°E	585'	House	S02°E	585'	Industrial	S84°W	3992'	NA	>5,280	S5°E	315'	N90°E	20'

The distance reported on the cultural distances workup now refers the distance from the production facility to the closest building as being 585' as opposed to the 510' referred to on based on data collected in the field with the survey.

The existing pond to the West has been added to the hydrology map. See attached.

The pond as well as the equipment and existing power lines have been added to the location drawing.

Let me know if there's anything else.

Thank you,

 Callie Fiddes

Regulatory Technician

Direct: 303.398.0550


Fax: 866.742.1784


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From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Tuesday, November 18, 2014 9:12 AM
To: Regulatory Permitting
Cc: Penny Garrison - DNR
Subject: COGCC Form 2A review of Great Western's BURR FD PAD location - Doc #400708100

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3 attachments

 **Burr FD Construction Drawing.pdf**
456K

 **Burr FD Location Drawing.pdf**
181K

 **Burr FD Hydro Map.pdf**
2657K

Andrews - DNR, Doug <doug.andrews@state.co.us>
 To: Regulatory Permitting <regulatorypermitting@gwogco.com>

Wed, Dec 10, 2014 at 9:52 AM

Callie,

Thank you for the additional information and revised drawings. It is very helpful. I have a few followup responses.

A) While your revised Location Drawing now shows the exiting pond and power lines to the west, the existing production facility to the southwest, and the existing power lines to the south along CR 66, there is no distance and bearing listed for these surface improvements. Additionally the existing Deshazo 24-44 wellhead to the northwest, the existing dirt road to the west, and the existing fence line to the west also do not have a distance and bearing listed. Per our Rules, the approximate distance and bearing to **all** visible improvements within 500 feet of the edge of the disturbed area shall be on the Location Drawing. Please revise the Location Drawing to included these approximate distances and bearings.

B) The COGCC's definition of a High Occupancy Building can be found in the 100-Series of our Rules. That definition is as follows: HIGH OCCUPANCY BUILDING UNIT shall mean:

- any operating Public School as defined in § 22-7-703(4), C.R.S., Nonpublic School as defined in § 22-30.5-103.6(6.5), C.R.S., Nursing Facility as defined in § 25.5-4-103(14), C.R.S., Hospital, Life Care Institutions as defined in § 12-13-101, C.R.S., or Correctional Facility as defined in § 17-1-102(1.7), C.R.S., provided the facility or institution regularly serves 50 or more persons; or
- an operating Child Care Center as defined in § 26-6-102(1.5), C.R.S.

Therefore, the warehouse to the southwest does not meet our definition of a High Occupancy Building and it appears the nearest High Occupancy Building is greater than a mile from this proposed location.

C) Now that the Public Comment period has ended for this Form 2A, please send me a letter certifying Great Western's compliance with COGCC Rule 306.e. If any meetings or consultations took place concerning this proposed location, please let me know the outcome. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

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Regulatory Permitting <regulatorypermitting@gwogco.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Dec 17, 2014 at 4:01 PM

Hi Doug,

Attached is an updated location drawing. Can we please change the distance to a high occupancy building unit to 5280? Also, attached is the certification.

Thanks,

 Callie Fiddes

Regulatory Technician

Direct: [303.398.0550](tel:303.398.0550)

Fax: [866.742.1784](tel:866.742.1784)

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From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Wednesday, December 10, 2014 9:52 AM
To: Regulatory Permitting
Subject: Re: COGCC Form 2A review of Great Western's BURR FD PAD location - Doc #400708100

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2 attachments

 **Burr FD 23 LOCATION DRAWING.pdf**
194K

 **Burr Operator Certification Rule 306.e.pdf**
134K