

STATE OF
COLORADO

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

Kindsfater 24JM-HZ Cultural Distances

13 messages

Kelsi Welch <Kelsi.Welch@pdce.com>

Tue, Oct 21, 2014 at 10:07 AM

To: "doug.andrews@state.co.us" <doug.andrews@state.co.us>

Hi Doug,

Please see attached the well location plat for the Kindsfater 24J-223 for cultural distances. This is the reference well we used for the Kindsfater 24JM-HZ Form 2A. Please let me know if you have any additional questions.

Thank you!



Kelsi Welch

Regulatory Analyst – Progressive Consulting

PDC Energy, Inc., 1775 Sherman Street, Suite 3000, Denver, CO 80203

Office: (303) 860-5800 | Kelsi.Welch@pdce.com



Kindsfater 24J-223_Plat.pdf

268K

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

Tue, Oct 21, 2014 at 10:22 AM

To: Kelsi Welch <Kelsi.Welch@pdce.com>

Kelsi,

Unfortunately this is not going to work. It doesn't provide a distance to the nearest Building and Building Unit.

Per the Form 2 APD (Doc #400673188), it appears the Kindsfater 24M-403 well is the closest well to a Building (532 feet) and Building Unit (691 feet). However, I'm not sure if the separators as shown on your Proposed Facility Layout Drawing are actually closer to the nearest Building and Building Unit than this well. Will you get with your surveyors and find out if the separators are closer than this well?

I suspect the nearest Building and Building Unit to the northeast are owned by the Surface Owner (Mr. Kindsfater). Please confirm if my guess is correct and will you also tell me who the Building Unit owner to the north across Highway 392 is? Thanks.

[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
303-894-2100 Ext. 5180

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

Tue, Oct 21, 2014 at 11:38 AM

Hi Doug,

I have spoken with my surveyors and will get the distances from the production facility to the nearest building and building unit to you as soon as they get back with me.

You are correct, the building and building unit to the northeast are owned by the surface owner, Mr. Kindsfater (Kindsfater Farms, LLC). The building unit owner to the north across Highway 392 is Lloyd Kindsfater.

Please let me know if you need any additional information from me.

Thanks!

Kelsi

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Tuesday, October 21, 2014 10:22 AM
To: Kelsi Welch
Subject: Re: Kindsfater 24JM-HZ Cultural Distances

[Quoted text hidden]

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

Tue, Oct 21, 2014 at 1:08 PM

Hi Doug,

Please see attached the revised location drawing for the Kindsfater 24JM-HZ locations to show cultural distances measured from the production facility. Please let me know if you need anything else.

Thanks!

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Tuesday, October 21, 2014 10:22 AM
To: Kelsi Welch
Subject: Re: Kindsfater 24JM-HZ Cultural Distances

Kelsi,

[Quoted text hidden]

[Quoted text hidden]



LOCATION DWG_KINDSFATER 24JM-HZ PAD (2014-10-21).pdf
419K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Kelsi Welch <Kelsi.Welch@pdce.com>

Tue, Oct 21, 2014 at 2:53 PM

Kelsi,

Thanks for the revised Location Drawing. The measurement table at the bottom of the second page was very helpful. I have completed my review of this Form 2A (Doc #400681301) and have some additional comment.

1) Since MLVTs are not considered production facilities, they should not be used when determining the nearest distances in the Cultural Distance section. Therefore, based on the revised Location Drawing, I will change the distance to the nearest Building and Building Unit to 456 feet and 541 feet, respectively. This also means this proposed Oil and Gas Location is not within an Exception Zone, but only a Buffer Zone.

2) A review of your revised Location Drawing indicates there is a domestic drinking water well 657 feet northeast of the proposed Oil and Gas Location. Therefore I will change this distance in the Water Resources section.

3) You have indicated there will be two buried produced water vaults at this proposed Oil and Gas Location. Due to the likelihood of shallow groundwater (12 feet) in the area of this proposed Oil and Gas Location, please provide me with a Best Management Practice for the construction and installation of these water vaults that is protective of potential impacts to the shallow groundwater.

4) The COGCC policy on the use of MLVTs states: *"COGCC will not approve MLVTs within 500 feet of a Building Unit or 1,000 feet of a High Occupancy Building Unit unless the Operator meets with the Director to discuss reasons for siting the MLVT at the proposed location and to discuss all potential alternative locations."*

Your Location Drawing indicates the proposed MLVTs for this Oil and Gas location will be 294 feet from a Building Unit. Please let us know of a time when you and PDC Energy can come in

and discuss your reasons for siting the MLVTs this close to a Building Unit and any potential alternative locations.

Please respond to this correspondence by November 21, 2014. If you have any questions, please contact me.

[Quoted text hidden]

Kelsi Welch <Kelsi.Welch@pdce.com>

Tue, Oct 21, 2014 at 4:09 PM

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

Doug,

Thank you for your comments. I will speak with my team and let you know as soon as possible about meeting with the COGCC to discuss these MVLVT locations.

Please see below PDC's BMP for the construction and installation of the buried water tanks.

Material Handling and Spill Prevention: To prevent adverse impacts to shallow groundwater, buried produced water vault shall be installed above an impermeable synthetic or geosynthetic liner system which shall be tied back into the surface liner.

Thank you!

Kelsi

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

Sent: Tuesday, October 21, 2014 2:53 PM

[Quoted text hidden]

[Quoted text hidden]

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

Mon, Nov 3, 2014 at 9:37 AM

To: Kelsi Welch <Kelsi.Welch@pdce.com>

Kelsi,

Thanks for sending me the Rule 306.e. Certification letter. However, I'm still waiting to hear back from you concerning my comment regarding the MLVT locations.

4) The COGCC policy on the use of MLVTs states: *"COGCC will not approve MLVTs within 500 feet of a Building Unit or 1,000 feet of a High Occupancy Building Unit unless the Operator meets with the Director to discuss reasons for siting the MLVT at the proposed location and to discuss all potential alternative locations."* Your Location Drawing indicates the proposed MLVTs for this Oil and Gas location will be 294 feet from a Building Unit. Please let us know of a time when you and PDC Energy can come in and discuss your reasons for siting the MLVTs this close to a Building Unit and any potential alternative locations.

[Quoted text hidden]

Kelsi Welch <Kelsi.Welch@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Mon, Nov 3, 2014 at 9:59 AM

Doug,

Our team is still working on moving this MLVT so it will not be an issue. I will let you know as soon as I get an update.

Thank you!

Kelsi

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Monday, November 03, 2014 9:37 AM

[Quoted text hidden]

[Quoted text hidden]

Kelsi Welch <Kelsi.Welch@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Thu, Nov 20, 2014 at 10:07 AM

Hi Doug,

I just wanted to touch in with you and let you know that we are still working on this. I apologize for the inconvenience. We will get back to you with new plats as soon as we get them.

Thanks!

Kelsi

From: Kelsi Welch
Sent: Monday, November 03, 2014 9:59 AM
To: 'Andrews - DNR, Doug'
Cc: Shayelyn Marshall
Subject: RE: Kindsfater 24JM-HZ Cultural Distances

Doug,

Our team is still working on moving this MLVT so it will not be an issue. I will let you know as soon as I get an update.

Thank you!

Kelsi

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]

Sent: Monday, November 03, 2014 9:37 AM

[Quoted text hidden]

[Quoted text hidden]

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

Mon, Dec 8, 2014 at 1:35 PM

To: Kelsi Welch <Kelsi.Welch@pdce.com>, Holly Taylor - DNR <holly.taylor@state.co.us>

Cc: Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Kelsi,

Do you have any updates for me concerning PDC moving the MLVTs so they are not within 500 feet of any Building Units. Thanks.

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

[Quoted text hidden]

Kelsi Welch <Kelsi.Welch@pdce.com>

Mon, Dec 8, 2014 at 2:22 PM

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

Cc: Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Hi Doug,

I apologize for the delay. We will be moving the MVLTS so they are not within 500 ft of any building units and we are also making a few other revisions per request of the surface owner. We do not have any final plans in hand yet, but I will let you know as soon as we do.

Thank you!

Kelsi

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Monday, December 08, 2014 1:36 PM
To: Kelsi Welch; Holly Taylor - DNR
Cc: Shayelyn Marshall

[Quoted text hidden]

[Quoted text hidden]

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

Mon, Jan 12, 2015 at 8:43 AM

To: Kelsi Welch <Kelsi.Welch@pdce.com>

Cc: Holly Taylor - DNR <holly.taylor@state.co.us>, Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Kelsi,

Its been a month since I last heard from you concerning the MLVTs at this proposed location. Will you provide me with an update? 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

[Quoted text hidden]

Shayelyn Marshall <Shayelyn.Marshall@pdce.com>

Mon, Jan 12, 2015 at 1:25 PM

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

Cc: Holly Taylor - DNR <holly.taylor@state.co.us>

Hi Doug,

Per our conversation this morning, please see the update plats attached for the Kindsfater location. PDC has removed the northern-most MLVT pad in order to comply with the MLVT policy. Our field manager is working with the surface owner to add a secondary access. We are not sure if/when this will be agreed upon, but we will keep you updated if we decide to include the additional access.

Please let me know if you have any questions.

Thanks!
Shaye

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Monday, January 12, 2015 8:43 AM
To: Kelsi Welch
Cc: Holly Taylor - DNR; Shayelyn Marshall

[Quoted text hidden]

[Quoted text hidden]

5 attachments



ACCESS_KINDSFATER 24JM-HZ PAD (2014-10-28).pdf
1542K



HYDRO_KINDSFATER 24JM-HZ PAD (2014-10-28).pdf
1057K



LOCATION DWG_KINDSFATER 24JM-HZ PAD (2014-10-28).pdf
374K



NOTIFICATION_ZONE_KINDSFATER 24JM-HZ PAD (2014-10-28).pdf
346K



SCALED FACILITY_KINDSFATER 24JM-HZ PAD (2015-01-12).pdf
185K