

STATE OF
COLORADO

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

COGCC Form 2A review of Bonanza Creek's Whitetail F-4 Pad location - Doc #400732657

3 messages

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

Mon, Dec 8, 2014 at 11:43 AM

To: Randy Edelen <REdelen@bonanzacrk.com>, Dana Strunk <dstrunk@bonanzacrk.com>

Cc: John Noto - DNR <john.noto@state.co.us>, Melissa Housey - DNR <melissa.housey@state.co.us>, Rebecca Treitz - DNR <rebecca.treitz@state.co.us>, Penny Garrison - DNR <penny.garrison@state.co.us>

Randy,

I have completed my review of the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) In the Related Remote Locations section you have indicated the wells on this proposed oil and gas location will produce to your Crow Valley CPF O-32 Pad location (Location ID #440295 / Form 2A Doc #400723381). However, in the Facilities section you have also listed a large number of production facilities on this proposed location. This is rather confusing and excessive. The way this Form 2A has been submitted, it appears as if Bonanza Creek has not decided on a course of action for where these proposed oil and gas wells will produce to. The 2A process is not intended to permit multiple new locations/surface disturbances for the development and production of the same oil and gas wells. The COGCC is looking to Operators to consolidate both their oil and gas wells and production facilities into as few locations/surface disturbances as possible and then submit a Form 2A that demonstrates this plan. Please provide clarification and explanation as to why this proposed location is being submitted to produce the oil and gas wells to multiple locations.
- 2) In the Cultural Distances section you have indicated the nearest Building is 2,249 feet from the nearest well and 2,045 feet from the nearest production facility. During my review, this nearest Building appears to be a house which would also make it the nearest Building Unit. Therefore, I would like to change the distance to the nearest Building Unit from 5,280 to match that of the nearest Building.
- 3) In the Cultural Distance section you have indicated the nearest Above Ground Utility is 335 feet from the nearest well and 95 feet from the nearest production facility. However, no Above Ground Utilities are depicted on your Location Drawing. Please revise your Location Drawing to show the horizontal distance and bearing to the Above Ground Utility.
- 4) In the Soils section you have indicated that one of the NRCS Soil Map Units this proposed oil and gas location will overlay is the 44-Olney fine sandy loam, 0-6% slopes. However, during my review it appears that it will overlay the 44-Olney loamy sand, 1-3% slopes NRCS Soil Map Unit. Please send me that NRCS Soil Unit Description and I will add it to the Form 2A.

Please respond to this correspondence by January 8, 2015. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources

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

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

Mon, Dec 8, 2014 at 3:32 PM

To: Randy Edelen <REdelen@bonanzacrk.com>, Dana Strunk <dstrunk@bonanzacrk.com>

Randy,

Just got your voicemail. Sorry for the confusion as I also got confused about the NRCS Soil Map Units when I was reviewing this 2A. It looks like there are two 44-Olney NRCS Soil Map Units. This location will also overlap onto the 44-Olney loamy sand, 1-3% slopes. You included the 44-Olney fine sandy loam, 0-6% slopes NRCS Soil Description. So the description I'm looking to add to this 2A is the 44-Olney loamy sand, 1-3% slopes. Thanks.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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[Quoted text hidden]

Randy Edelen <REdelen@bonanzacrk.com>

Tue, Dec 9, 2014 at 4:08 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Dana Strunk <DStrunk@bonanzacrk.com>

Cc: Steve Grigel <SGrigel@bonanzacrk.com>

See responses below

Randy Edelen, P. E.

Regulatory Specialist

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Denver, CO 80202

Bonanza Creek website



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

Sent: Monday, December 08, 2014 3:32 PM

To: Randy Edelen; Dana Strunk

Subject: Re: COGCC Form 2A review of Bonanza Creek's Whitetail F-4 Pad location - Doc #400732657

Randy,

Just got your voicemail. Sorry for the confusion as I also got confused about the NRCS Soil Map Units when I was reviewing this 2A. It looks like there are two 44-Olney NRCS Soil Map Units. This location will also overlap onto the 44-Olney loamy sand, 1-3% slopes. You included the 44-Olney fine sandy loam, 0-6% slopes NRCS Soil Description. So the description I'm looking to add to this 2A is the 44-Olney loamy sand, 1-3% slopes. Thanks.

Doug Andrews

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On Mon, Dec 8, 2014 at 11:43 AM, Andrews - DNR, Doug <doug.andrews@state.co.us> wrote:

Randy,

I have completed my review of the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) In the Related Remote Locations section you have indicated the wells on this proposed oil and gas location will produce to your Crow Valley CPF O-32 Pad location (Location ID #440295 / Form 2A Doc #400723381). However, in the Facilities section you have also listed a large number of production facilities on this proposed location. This is rather confusing and excessive. The way this Form 2A has been submitted, it appears as if Bonanza Creek has not decided on a course of action for where these proposed oil and gas wells will produce to. The 2A process is not intended to permit multiple new locations/surface disturbances for the development and production of the same oil and gas wells. The COGCC is looking to Operators to consolidate both their oil and gas wells and production facilities into as few locations/surface disturbances as possible and then submit a Form 2A that demonstrates this plan. Please provide clarification and explanation as to why this proposed location is being submitted to produce the oil and gas wells to multiple locations.

This is really for future planning and goes along with that bearing of the OGLA process. Centralized production facilities result in the least amount of surface disturbance and the facilities on location are planning for upset conditions, changes in planning, and other unforeseen circumstances that will make a separate CPF untenable. The following is a narrative from our Facilities Manager, Steve Grigel, on his rational in designing and permitting in this fashion.

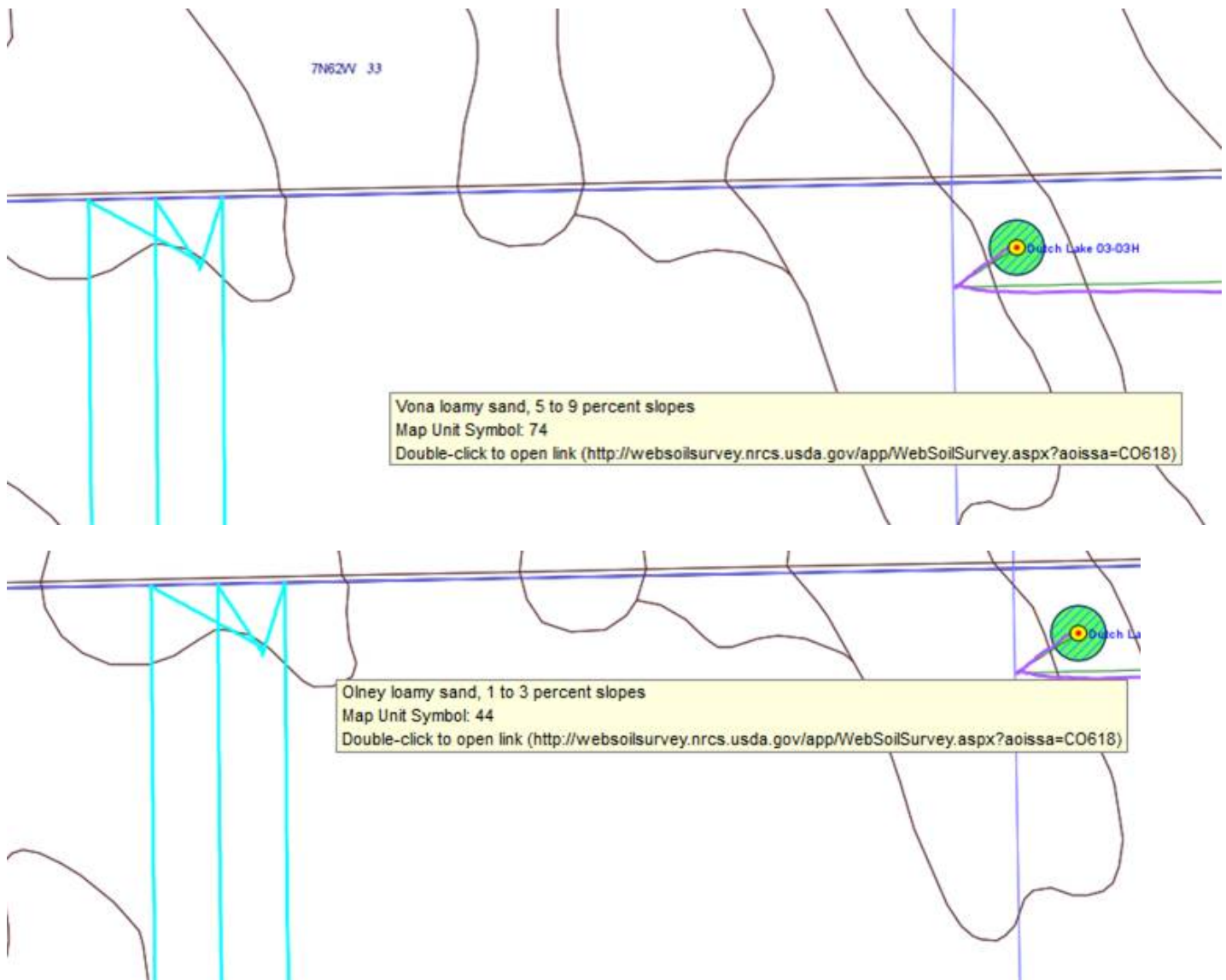
BCEI is working to consolidate its oil and gas facilities when and where possible for the multiple benefits. In this case, there was some uncertainty regarding the availability of a central CPF location and an alternate on-site location was conceptualized. Obviously, we do not want to build excessive facilities or land disturbance and will build the facilities accordingly.

2) In the Cultural Distances section you have indicated the nearest Building is 2,249 feet from the nearest well and 2,045 feet from the nearest production facility. During my review, this nearest Building appears to be a house

which would also make it the nearest Building Unit. Therefore, I would like to change the distance to the nearest Building Unit from 5,280 to match that of the nearest Building. **Please make this change**

3) In the Cultural Distance section you have indicated the nearest Above Ground Utility is 335 feet from the nearest well and 95 feet from the nearest production facility. However, no Above Ground Utilities are depicted on your Location Drawing. Please revise your Location Drawing to show the horizontal distance and bearing to the Above Ground Utility. **See attached**

4) In the Soils section you have indicated that one of the NRCS Soil Map Units this proposed oil and gas location will overlay is the 44-Olney fine sandy loam, 0-6% slopes. However, during my review it appears that it will overlay the 44-Olney loamy sand, 1-3% slopes NRCS Soil Map Unit. Please send me that NRCS Soil Unit Description and I will add it to the Form 2A. **I make this to be on soil types 44 and 74, which is what I sent. See map screenshots of both soil types below.**



Please respond to this correspondence by January 8, 2015. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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WHITETAIL F-4 MAP LOCATION DRAWING.pdf
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