

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:

400654951

0

Date Received:

11/20/2014

Oil and Gas Location Assessment

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

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:

440718

Expiration Date:

01/27/2018

☒ 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: 10359

Name: WARD PETROLEUM CORPORATION

Address: PO BOX 1187

City: ENID State: OK Zip: 73702

Contact Information

Name: Andrea Gross

Phone: (303) 942-0506

Fax: ()

email: agross@upstreampm.com

RECLAMATION FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID: 20100221 ☐ Gas Facility Surety ID: _____

☐ Waste Management Surety ID: _____

LOCATION IDENTIFICATION

Name: Schaefer Number: 24-3-7HC

County: ADAMS

QuarterQuarter: SWSE Section: 24 Township: 1S Range: 67W Meridian: 6 Ground Elevation: 5022

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: 419 feet FSL from North or South section line

2003 feet FEL from East or West section line

Latitude: 39.944470 Longitude: -104.834980

PDOP Reading: 2.0 Date of Measurement: 04/11/2014

Instrument Operator's Name: Robert Daley

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 | 16 | Oil Tanks* | 20 | Condensate Tanks* | | Water Tanks* | 20 | Buried Produced Water Vaults* | |
| Drilling Pits | | Production Pits* | | Special Purpose Pits | | Multi-Well Pits* | | Modular Large Volume Tanks | |
| Pump Jacks | | Separators* | 16 | Injection Pumps* | | Cavity Pumps* | | Gas Compressors* | |
| Gas or Diesel Motors* | | Electric Motors | | Electric Generators* | | Fuel Tanks* | | LACT Unit* | |
| Dehydrator Units* | | Vapor Recovery Unit* | | VOC Combustor* | | Flare* | | Pigging Station* | |

OTHER FACILITIES*

Other Facility Type

Number

| | |
|--------|----|
| ECD | 8 |
| Meters | 16 |

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:

2" or 3" fusion bonded Schedule 40 steel.

CONSTRUCTION

Date planned to commence construction: 12/29/2014 Size of disturbed area during construction in acres: 5.70
Estimated date that interim reclamation will begin: 05/29/2015 Size of location after interim reclamation in acres: 2.80
Estimated post-construction ground elevation: 5022

DRILLING PROGRAM

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

Is H₂S 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: Elaine Schaefer

Phone: _____

Address: 13295 E. 136th Ave.

Fax: _____

Address: _____

Email: _____

City: Brighton State: CO Zip: 80601

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: No

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 04/01/2014

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: | 449 Feet | 145 Feet |
| Building Unit: | 560 Feet | 303 Feet |
| High Occupancy Building Unit: | 5280 Feet | 5280 Feet |
| Designated Outside Activity Area: | 5280 Feet | 5280 Feet |
| Public Road: | 400 Feet | 140 Feet |
| Above Ground Utility: | 435 Feet | 117 Feet |
| Railroad: | 978 Feet | 975 Feet |
| Property Line: | 419 Feet | 159 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: 05/15/2014

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 Production Facility location was chosen after careful consideration of setbacks, including existing overhead utility line, topography, and discussions with the surface owner. Due to surface owner constraints and topography Ward was limited on the placement of the production facility.

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: NIA- Nunn 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: Western wheatgrass, Green needlegrass, Bottlebrush squirreltail, Needleandthread, Blue grama

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: _____ 0 Feet

water well: _____ 245 Feet

Estimated depth to ground water at Oil and Gas Location _____ 24 Feet

Basis for depth to groundwater and sensitive area determination:

Depth to groundwater was determined from Water Well Permit 9002514 which is the closest water well. Sensitive area was marked as the location is within the Brighton aquifer. Distance to nearest water feature is to an irrigation ditch west of the location.

Nearest surface water feature transects the proposed Location.

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: This location is within a Floodplain. Ward has already submitted and received and approved Adams County Floodplain Use Permit.

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

Signed: _____ Date: 11/20/2014 Email: agross@upstreampm.com

Print Name: Andrea Gross Title: Permit Agent

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: 1/28/2015

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. |
| | Operator shall prepare and implement an emergency spill response program that includes employee training, safety, and maintenance provisions and current contact information for Brighton. The emergency response plan shall specify when notifications to Brighton shall be made and must be prepared in consultation with Brighton. |
| | Operator shall provide notification to the Brighton Public Works Department prior to commencement of new surface disturbing activities at the site. |
| | Secondary containment shall be sized to contain a minimum of 150% of the volume of the largest primary containment vessel within the secondary containment area. |
| | Location lies within proximity of surface water drainages and lies within the Brighton BMP Buffer Zone. Tertiary containment shall be placed along the downgradient and crossgradient portions of Production Facilities, including process vessels. |
| | Location lies within a Sensitive Area with potential shallow groundwater and is located within a Designated Groundwater Protection Area for the Brighton Aquifer. Secondary containment areas for production facilities shall be constructed of steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation and shall be constructed with a synthetic or engineered liner that contains all primary containment vessels and flowlines and is mechanically connected to the steel ring to prevent leakage. |

Best Management Practices

No BMP/COA Type

Description

| | | |
|---|----------|--|
| 1 | Planning | Site Specific Measures: Ward will maintain a Stormwater Management Plan with site specific measurements to assess erosion control. |
|---|----------|--|

| | | |
|----|--|---|
| 2 | Planning | Development from existing well pads: There were no existing wellpads to drill these proposed wells from. However, in order to reduce surface disturbance, Ward is permitting this 2A for twelve (12) wells and plans for this to be a multi-wellpad. The well pad will be constructed in a manner that noise mitigation will be installed and removed without disturbing the site or landscaping. The pad will have an all-weather access road to allow for operator and emergency responders. |
| 3 | Traffic control | Traffic Plan: A traffic plan will be done if request by Adams County. |
| 4 | Traffic control | If required by Adams County, a traffic plan will be coordinated prior to commencement of move in and rig up. |
| 5 | Traffic control | Ward will construct all leasehold road to accommodate local emergency vehicle access requirements and will be maintained in a reasonable condition. |
| 6 | General Housekeeping | Loadlines: All loadlines shall be bullplugged or capped. |
| 7 | General Housekeeping | Guy Line Anchors: All guy line anchors left buried for future use will be identified by a marker of bright color not less than four feet in height and not greater than one foot east of the guy line anchor. |
| 8 | General Housekeeping | Removal of Surface Trash: Ward agrees that all trash, refuse pipe, equipment, liquids, chemicals of other materials that are not necessary for the continued operations of the wells will be removed and disposed of no later than 30 days after completion. No such items will be burned or buried on location. |
| 9 | General Housekeeping | Well Site Cleared: Ward agrees that all trash, refuse pipe, equipment, liquids, chemicals of other materials that are not necessary for the continued operations of the wells will be removed and disposed of no later than 30 days after completion. No such items will be burned or buried on location. |
| 10 | Material Handling and Spill Prevention | Leak Detection Plan: To ensure protection for the surface during fracturing treatment, the location will be specifically constructed to contain any releases or spills. Secondary containment from any chemical spills or leaks will surround any trucks that carry, mix, or add chemicals to the flow stream as well as connections that could possibly leak fluid. Should any spill or release occur, every reasonable step will be taken to quickly remediate the area disturbed. |
| 11 | Material Handling and Spill Prevention | Control of Fire Hazards: Ward and its contractor's employ best management practices during the drilling and production of its wells and facilities. They will comply with appropriate COGCC and any county rules concerning fire and safety. Ward will ensure that any flammable material will remain no less than 25 feet from the wellhead (s), tanks and separator(s). |
| 12 | Material Handling and Spill Prevention | Berm Construction: Containment berms will be constructed of steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation. Secondary containment areas for tanks will be constructed with a synthetic or engineered liner that contains all primary containment vessels and flowlines and is mechanically connected to the steel ring to prevent leakage. |
| 13 | Material Handling and Spill Prevention | Tank specifications: Tanks shall be constructed and maintained in accordance with the National Fire Protection Association Code 30 (2008 version). All tanks will be visually inspected once a day for issues. Recorded inspections will be conducted once a month pursuant to 40 CFR §112. |
| 14 | Dust control | Operator will comply with Rule 805.c and take all practicable measures to control fugitive dust caused by the operation, including but not limited to wetting the soil with fresh water via a truck with a spreader bar if deemed necessary. |
| 15 | Construction | Fencing: The wellsite will be fenced if requested by the Surface Owner. |
| 16 | Construction | Visual Mitigation: Pursuant to Rule 804, the tank battery shall be painted in uniform, non-contrasting, non-reflective color tones with the colors matched to but slightly darker than the surrounding landscape. Additionally, because the location is within the Rule 604.a.(2) setback due to its proximity to the dealership to the south and east, the battery facilities will be fenced with a 6' chain-link fence, the color for which shall be sufficiently similar to the tank color. This fence shall serve to restrict access to the site by unauthorized persons and as visual mitigation of the facility components. |
| 17 | Noise mitigation | Temporary sound barriers may be installed if necessary. |

| | | |
|----|--------------------------------|--|
| 18 | Drilling/Completion Operations | Closed Loop System: Closed Loop System will be used for drilling and fluid management. No reserve pit will be used or fresh water pits. |
| 19 | Drilling/Completion Operations | Green Completions: Ward will comply with COGCC Rule 805b.(3)A and utilize Green Completion Methods. |
| 20 | Drilling/Completion Operations | <p>BOPE Testing: Upon initial rig-up and once every 30 days during drilling operations, pressure testing of the casing string and each component of the BOPE will be performed to 70% of working pressure or 70% of the internal yield of the casing, whichever is less.</p> <p>BOPE for well servicing operations: Adequate blowout prevention equipment will be used on any servicing operations associated with this well. Backup staving valves shall be required on well servicing operations during reverse circulation. Valves will be pressure tested before each well servicing operation using both low-pressure and high-pressure fluid.</p> <p>BOPE: Ward will utilize drilling rigs with a minimum of a double ram and annular preventer.</p> |
| 21 | Drilling/Completion Operations | Drill Stem Tests: Drill Stem Tests are not anticipated for this location. |
| 22 | Drilling/Completion Operations | Pit Level Indicators: Pit Level Indicators will not be needed as no pits will be used on location. |
| 23 | Final Reclamation | <p>Identification of Plugged and Abandoned Wells: Pursuant to Rule 319.a.(5)., once the well has been plugged and abandoned, Ward will identify the location of the wellbore with a permanent monument that will detail the well name and date of plugging upon a permanent monument.</p> <p>The well site will be cleared within 90 days after a well is plugged and abandoned. The wellsite will be cleared of all non-essential equipment and trash.</p> |

Total: 23 comment(s)

Attachment Check List

| <u>Att Doc Num</u> | <u>Name</u> |
|---------------------------|-------------------------|
| 1009749 | 306.e CERTIFICATION |
| 1696453 | SURFACE AGRMT/SURETY |
| 400654951 | FORM 2A SUBMITTED |
| 400729666 | CONST. LAYOUT DRAWINGS |
| 400729668 | HYDROLOGY MAP |
| 400729671 | LOCATION PICTURES |
| 400729673 | NRCS MAP UNIT DESC |
| 400734983 | WASTE MANAGEMENT PLAN |
| 400736833 | MULTI-WELL PLAN |
| 400736853 | ACCESS ROAD MAP |
| 400742733 | LOCATION DRAWING |
| 400742736 | 30 DAY NOTICE LETTER |
| 400742739 | FACILITY LAYOUT DRAWING |
| 400745282 | NRCS MAP UNIT DESC |

Total Attach: 14 Files

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|--------------------------|---|----------------------------|
| Permit | Final Review Completed. LGD comment addressed (see COA's on form 2A); no public comment received. | 1/28/2015 9:06:41 AM |

| | | |
|--------|---|--------------------------|
| OGLA | UPDATE as of 01/16/2015 - Awaiting Operator discussion on the status of the irrigation ditch trasecting the pad and/or how the ditch will be protected. | 1/16/2015 3:24:08 PM |
| OGLA | Operator has addressed the irrigation ditch that transects the proposed Location. Per Operator email dated 01/22/2015 - "Ward met with Ms. Schaefer yesterday to confirm the "ditch" question. She confirmed that it is not a ditch but only a surface hump to keep water from moving west. They have come to an agreement with Ms. Schaefer that they will either move it to the west side of the pad or limit the pad within the hump." | 1/9/2015 1:52:09 PM |
| Permit | Received and attached SUA with operator and surface owner signatures. Changed Right to Construct to SUA. Permitting Review Completed. | 1/9/2015 9:10:46 AM |
| OGLA | Per Operator 01/05/2015 email, nursery is not open to the public and houses limited staff. The nursery is considered a warehouse building per COGCC Rules and Definitions. Location does not lie within an Urban Mitigation Area. | 1/6/2015 12:56:34 PM |
| OGLA | Added "Ward will construct all leasehold road to accommodate local emergency vehicle access requirements and will be maintained in a reasonable condition." to the BMPs per Operator email. | 1/6/2015 12:55:41 PM |
| OGLA | Discussion with Operator Agent regarding the status of the nursery operations (retail vs. industrial). Waiting further information. | 1/2/2015 5:06:19 PM |
| Public | <p>TO:John Noto, COGCC Oil and Gas Location Assessment Supervisor</p> <p>Email: john.noto@state.co.us</p> <p>Melissa Housey, COGCC OGLA Southeast Location Specialist</p> <p>Email:melissa.housey@state.co.us</p> <p>FR:Matt Sura, Special Counsel, City of Brighton</p> <p>DT:12/22/2014</p> <p>RE:Comment on Form 2A #400654951 and Form 2 #400659785, Ward Petroleum Corporation's "Schaefer" location Number 24-3-7HC, and well number 25-1-4HC, in Sec 24, Twp 1S Rng 67W</p> <p>Dear COGCC,</p> <p>These comments are submitted on behalf of the City of Brighton.Brighton requests that additional conditions be added to the Form 2A and Form 2 permits to bring the proposal into compliance with COGCC Order No. 1-189 "Brighton Public Water Supply Protection".Brighton also requests that traffic concerns be addressed in the permit and that the location be required to have some landscaping as it is the south gateway into the City of Brighton.</p> <p>Other than the issues indicated above, the City of Brighton supports the location of the Ward wells and production facilities as they are a sufficient distance from Brighton homes and businesses.</p> <p>Brighton Public Water Supply Protection</p> <p>In July of 2014, the COGCC passed Order No. 1-189 "Brighton Public Water Supply Protection" to provide additional protection for Brighton public water supply areas.The Order received unanimous support from the COGCC as well as City of Brighton and local oil and gas operators. The Order requires that additional best management practices (BMPs) be added as conditions of approval for oil and gas locations within ½ mile (2,640 ft) of wells, reservoirs, rivers, streams and ditch segments that are necessary to supply the City of Brighton residents with clean drinking water.</p> <p>The proposed Ward locations are approximately 900 feet from Third Creek— well within the designated ½ mile "BMP Buffer Zone". The BMPs required within the</p> | 12/23/2014 2:36:48 PM |

| | | |
|--|---|--|
| | <p>Buffer Zone include the following:</p> <p>(1) Pitless drilling systems;</p> <p>(2) Flowback and stimulation fluids shall be contained within tanks that are placed on a well pad or in an area with downgradient perimeter berming;</p> <p>(3) Berms or other containment devices shall be constructed around crude oil, condensate, and produced water storage tanks as follows:</p> <p>a. Secondary containment shall be sized to contain a minimum of 150% of the volume of the largest primary containment vessel within the secondary containment area.</p> <p>b. Containment berms shall be constructed of steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation.</p> <p>c. Secondary containment areas for tanks shall be constructed with a synthetic or engineered liner that contains all primary containment vessels and flowlines and is mechanically connected to the steel ring to prevent leakage.</p> <p>d. Tertiary containment, such as an earthen site berm, is required around the downgradient and side-gradient portions of Production Facilities, including process vessels.</p> <p>(4) Production Facilities will be installed with automated fluid level monitoring, capable of alerting the Operator if a sudden change in fluid level or upset condition occurs. Additionally, wells will be equipped with remote shut-in capability.</p> <p>(5) All load lines shall be bullplugged or capped.</p> <p>(6) Notification to the Brighton Public Works Department prior to commencement of new surface disturbing activities at the site; and</p> <p>(7) An emergency spill response program that includes employee training, safety, and maintenance provisions and current contact information for Brighton. The emergency response plan shall specify when notifications to Brighton shall be made and must be prepared in consultation with Brighton. In the event of a spill or release, the Operator shall immediately implement the emergency response procedures in the above-described emergency response program. If a spill or release results in significant adverse impacts or threatens such impacts to a portion of the Brighton PWS, the Operator shall notify Brighton immediately following discovery of the release in addition to reporting in accordance with Rule 906.b.</p> <p>The City appreciates that Ward has planned to include secondary containment around the tanks. Brighton also requests that the other BMP requirements listed above be included as conditions of the permit for both the production facility and the proposed wells.</p> <p>Traffic Concerns</p> <p>The City of Brighton understands that there are an average of 2,000 truck trips for every oil and gas well. Brighton proposes that truck traffic from the site be routed northbound on US85 or east on 136th Ave to I-76. The traffic signal at the intersection of US85 and 136th is not able to handle the large volume of trucks should they go straight or left at the signal. The large traffic volume can be handled if it turns right (north) onto US85 or is directed to I-76.</p> <p>Visual and Aesthetic Concerns</p> <p>Ward Petroleum is proposing 20 water tanks and 20 oil tanks just east of the corner of 136th Avenue and Hwy 85. Highway 85 is considered by the City to be a main transportation corridor and a "gateway" into the City. As a gateway, the City requests that the COGCC require landscaping to provide some screening for the proposed 40 tanks that will be surrounded by a cyclone fence. The City of Brighton would like to</p> | |
|--|---|--|

| | | | |
|--------|--|---------------------------|--|
| | <p>meet with Ward to discuss possible solutions to this issue and would request that landscaping, in coordination with the City of Brighton, be a condition of this permit.</p> <p>The City of Brighton appreciates that a location was chosen a sufficient distance from Brighton homes and businesses. The City looks forward to the opportunity to meet with Ward Petroleum to discuss a spill response program and an appropriate landscaping plan for this location.</p> <p>Sincerely,</p> <p>Matt Sura</p> <p>Special Counsel,</p> <p>City of Brighton</p> | | |
| OGLA | <p>Removed NuA - Nunn clay loam, 0 to 1 percent slopes</p> <p>Revision of Lat./Long. coordinates moved the Location into one Soil Map Unit</p> | 12/22/2014 3:38:46 PM | |
| OGLA | <p>Approximate 74,000 sq. ft. nursery building is located within the 1,000-foot Urban Mitigation Area radius. Location may lie in an Urban Mitigation Area. LGD Notification.</p> <p>Missing 604.c(2)S Mitigation Measure</p> <p>Will require 306.e after Public Comment period is over</p> <p>Changed distance to nearest surface water feature to 0 feet. Nearest surface water feature transects the proposed Location.</p> | 12/22/2014 12:38:49 PM | |
| OGLA | <p>Changed Lat./Long. from landing to surface per Operator discussion and corresponding email.</p> | 12/22/2014 9:58:17 AM | |
| LGD | <p>This site is currently served by an existing access point. Adams County requires permits to move the Oil and Gas Drilling Rig both into and out of this location. Please contact Mr. Mark Russell at 720-523-6821 for information regarding these permits. This site also lies within an adjudicated flood plain. Please contact Mr. Greg Labrie at 720-523-6824 for further information regarding the possibility of a Flood Plain Use Permit.</p> | 12/11/2014 1:48:44 PM | |
| LGD | <p>This site is currently served by an existing access point. Adams County requires permits to move the Oil and Gas Drilling Rig both into and out of this location. Please contact Mr. Mark Russell at 720-523-6821 for information regarding these permits. This site also lies within an adjudicated flood plain. Please contact Mr. Greg Labrie at 720-523-6824 for further information regarding the possibility of a Flood Plain Use Permit.</p> | 12/11/2014 1:48:43 PM | |
| Permit | <p>Passed Completeness</p> | 12/4/2014 10:11:57 AM | |
| OGLA | <p>Passed Buffer Zone completeness review. Address the following issues in the technical review: Waste Management Plan describes Landfarm for cuttings and fluids disposal - correct 2A or verify that Dechant Farms is commercial facility, provide additional site-specific descriptions to support placement of Production Facility for Rule 604.c.(2)E.i rational.</p> | 12/4/2014 9:06:40 AM | |
| Permit | <p>Soil and Plant is missing additional NRCS information. Missing NuA. Sent to OGLA for further review.</p> | 12/2/2014 8:35:14 AM | |

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| OGLA | <p>Issues identified during Buffer Zone review:</p> <p>Rule 604.a.(1)A box incorrectly checked</p> <p>305.a. certification letter not attached</p> <p>Distances to cultural features on form inconsistent with distances listed on Location Drawing</p> <p>604.c.(2) Mitigation Measures not fully addressed in BMP section</p> <p>Facility Layout Drawing not attached</p> <p>Returned to DRAFT</p> | <p>11/26/2014 3:42:17 PM</p> |
| Permit | Within buffer zone, sent to OGLA for further review. | <p>11/21/2014 8:14:18 AM</p> |

Total: 18 comment(s)