

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

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**COGCC Form 2A review of Synergy Resources' Roberts 12-E Pad (Doc #400683603)**

2 messages

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**Andrews - DNR, Doug** <doug.andrews@state.co.us>  
To: Regulatory members <regulatory@petro-fs.com>

Wed, Feb 25, 2015 at 3:10 PM

Jeff,

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

1) The Form 2A and the attached Waste Management Plan (WMP) do not adequately address drilling fluids and cuttings disposal. You have indicated that drilling fluids and cuttings will be disposed of Offsite at a Land Application site that has yet to be determined. Therefore I would like to place the following Condition of Approval on the Form 2A:

*"Drilling fluids and cuttings disposal shall not occur until an approved Form 4 Sundry is submitted for the Location with either the Facility ID# of the COGCC approved Land Application Site or Centralized Waste Management Facility, or a statement that a commercial disposal facility will be used. If the operator does not have a COGCC approved facility, a Waste Management Plan and Land Application Plan Checklist shall be submitted. The Waste Management Plan and proposed Land Application Site must be approved prior to drilling fluids and cuttings disposal."*

2) During my review it appears the nearest Building to both the nearest well and nearest production facility is also the nearest Building Unit. I base this on the nearest Building being a commercial facility whose apparent square footage is great enough to meet our definition of a Building Unit. Therefore I would like to change the distance to the nearest Building Unit to match that of the nearest Building (1,708 feet and 1,517 feet) in the Cultural Distance section of the Form 2A.

Please respond to this correspondence by March 25, 2015. If you have any questions, please contact me. Thank you.

**Doug Andrews**

Oil &amp; Gas Location Assessment Specialist - Northeast Area

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

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**Jeffrey Annable** <jannable@petro-fs.com>

Thu, Feb 26, 2015 at 9:47 AM

To: "Andrews - DNR, Doug" &lt;doug.andrews@state.co.us&gt;, Regulatory members &lt;regulatory@petro-fs.com&gt;

Cc: "Kosola - DNR, Jason" &lt;jason.kosola@state.co.us&gt;

Hey Doug,

1)We agree with the COA.

2) I agree with you on the Nearest building also being the nearest Building Unit. Sorry for missing that.

Thanks,

Jeff Annable

Regulatory Technician

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

**Sent:** Wednesday, February 25, 2015 3:11 PM

**To:** Regulatory members

**Subject:** COGCC Form 2A review of Synergy Resources' Roberts 12-E Pad (Doc #400683603)

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