STATE OF COLORADO

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

Fwd: Long 22-B Pad

5 messages

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us> Tue, Mar 3, 2015 at 2:46 PM
To: Doug Andrews - DNR <doug.andrews@state.co.us>

---------- Forwarded message ----------
From: **Jeffrey Annable** <jannable@petro-fs.com>
Date: Fri, Feb 13, 2015 at 8:21 AM
Subject: Long 22-B Pad
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>
Cc: "Noto - DNR, John" <john.noto@state.co.us>, Regulatory members <regulatory@petro-fs.com>, Kristi McRedmond <kmcredmond@petro-fs.com>

Hey Rebecca,

Just wanted to follow up with you on the Long 22-B Pad. I spoke with the client and they informed us that the Surface Owner is only willing to grant an SUA to Edge if they located the pad in the part of the parcel that it is currently placed. He believes that is the best use of his land. In the spirit of cooperation with the Surface Owner Edge agreed to this location. I have attached a map showing the parcel ownership, and as you can see Long owns a good portion of the property in the area. In order to put the facilities on Link Ranch, Edge would have to pipe across the BUO property approximately 2000' feet which would present an economic burden. This would also put it in the vicinity (not buffer zone) of two BUO. In the interest of being a "good neighbor" the operator spoke with the BUO about their concerns. The operator has addressed the BUO concerns which included to visual mitigate the facilities with landscape screening, and to make sure that the BUO's water well would not be contaminated. Edge has also agreed to the following additional Noise mitigation:

Noise Mitigation: Baseline noise monitoring and testing will be conducted prior to commencement of construction and dirt work. Sound walls and/or hay bales will be implemented on the east side of the site to shield the building unit within the buffer zone. Both drilling and completion operations will be conducted within these sound barriers.

Given that all of the BUO concerns were addressed, the optional locations are not technically or economically feasible, Edge Energy believes the current location is the best location.

Please let me know what you guys think.

Thanks,

Jeff Annable

Regulatory Technician

Petroleum Field Services LLC

Office: 303-928-7128

Fax: 303-218-5678

7535 Hilltop Circle

Denver, CO 80221

Use our resources to find yours!

Please Follow us on Facebook, Twitter, and LinkedIn!

Confidentiality Notice: This e-mail message and attachments are only for the use of the intended recipient and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient, any disclosure, distribution or other use of this e-mail message or attachments is prohibited. If you have received this e-mail in error, please delete and notify the sender immediately. In addition, please be aware that any messages addressed to our domain are subject to archiving and review by persons other than the intended recipient.

Think green.

Please recycle and consider the environment before printing this email

--
Rebecca Treitz
Environmental Protection Specialist
P 303.894.2100 x5173 | F 303.894.2109 |
1120 Lincoln Street, Suite 801, Denver, CO 80203
Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

Edge Energy-- Long 22-B Pad Discussion Map.pdf
105K

Andrews - DNR, Doug <doug.andrews@state.co.us> Wed, Mar 4, 2015 at 1:28 PM
To: Jeffrey Annable <jannable@petro-fs.com>, Rebecca Treitz - DNR <rebecca.treitz@state.co.us>

Jeff,

I have taken on the review of Edge Energy's Long 22-B Pad Form 2A (Doc #400776249) from Rebecca. I have completed my review and have some additional comments. We are currently still evaluating the additional siting rationale information you have provided.

1) In the Facilities section and on the Facility Layout Drawing, the Operator has indicated there will be six flares at this proposed oil and gas location. This is very unusual and seems excessive to have so many flares . Typically a single flare is sufficient to handle the emissions from even the 12 Oil Tanks listed for this location. Please provide a justification/explanation as to why the Operator needs six flares.

2) While reviewing the Cultural Distances, I noticed that the nearest Building is closer to this proposed oil and gas location than the nearest Building Unit. While the Location Drawing does show what is labelled as a Building to be closer than the nearest Building Unit, a review of aerial photographs appears to show this nearest Building to be a 18-wheeler tractor trailer parked at the Building Unit Owners residence. If this is indeed the case, then the nearest Building Unit is also the nearest Building and I would like to change the distance to the nearest Building for both the well and the production facility on the Form 2A.

3) A review of the water well permit for the nearest water well (Permit #245545) indicates it is a Domestic drinking water well that was screened from 895 to 980 feet below ground surface. A review of other nearby water wells indicates many were also similarly screened quite deeply with similarly deep static water levels listed. Based on that I don't think the estimated depth to groundwater of 440 feet is reflective of how shallow groundwater may be in the area of this proposed oil and gas location. Additionally there are several ponds nearby as shown on the Hydrology Map that also lead me to believe that groundwater is considerably shallower than 440 feet. Therefore, I would like to change the estimated depth to groundwater to 20 feet, and add a comment that explains why this depth was chosen. The Operator has already provided an adequate Berm Construction BMP and no pits are proposed for this location, so this change to the Water resources' section would not affect the construction and operation plans for this location that have already been provided. Please let me know if this is acceptable.

4) Due to the potential for shallow groundwater in the area of this oil and gas location as discussed in my Comment #3 above and the fact that the nearest downgradient surface water feature is less than 100 feet away, I would like to change the Sensitive Area designation to YES in the Water Resources section.

5) In you email above and also in the Operator Comments section of the Form 2A you have indicated how the Operator will address the concerns raised by the nearby Building Unit Owner. I would like to take these and copy them into the Operator BMP section of this Form 2A. Please let me know if that is acceptable.

6) The Rule 604.c.(2)S - Access Roads BMP indicates "*Dust control will also be utilized.*" Please provide additional site specific details as to these dust control measures.

Please respond to this correspondence by April 4, 2015. If you have any questions, please contact me.

Doug Andrews
Oil & Gas Location Assessment Specialist - Northeast Area

COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

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

Edge Energy-- Long 22-B Pad Discussion Map.pdf
105K

Jeffrey Annable <jannable@petro-fs.com> Thu, Mar 5, 2015 at 2:18 PM
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Rebecca Treitz - DNR <rebecca.treitz@state.co.us>
Cc: Regulatory members <regulatory@petro-fs.com>

Hey Doug,

I have answers to your questions below:

1)The Operator is going to reduce the number of flares to 1. I will be sending you an updated facility layout when I get it.

2)I agree the building that was depicted on the location drawing is an 18 wheeler, and agree to the change in measurements.

3)I agree to the changes to the water well depths.

4)I agree to the change in sensitive area.

5)I agree that it is acceptable for the BMP

6)Here is a revised BMP for the Dust Mitigation:

- Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high- wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be required if technologically feasible and economically reasonable to minimize fugitive dust emissions.

Please let me know if the justification for location is acceptable. Let me know if there is anything else that

you need.

Thanks,

Jeff Annable

Regulatory Technician

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Wednesday, March 04, 2015 1:29 PM
To: Jeffrey Annable; Rebecca Treitz - DNR
Subject: Fwd: Long 22-B Pad

[Quoted text hidden]

Andrews - DNR, Doug <doug.andrews@state.co.us> Fri, Mar 6, 2015 at 1:18 PM
To: Jeffrey Annable <jannable@petro-fs.com>
Cc: Rebecca Treitz - DNR <rebecca.treitz@state.co.us>, Regulatory members <regulatory@petro-fs.com>

Jeff,

Thanks for the prompt reply. Now that the Public Comment period has ended, please also send a letter certifying Edge Energy's compliance with COGCC Rule 306.e when you send the updated Facility Layout Drawing. Please indicate in the certification letter the meetings/consultations that were held with the Building Unit Owner and what the outcome was. I know you were mentioned in your email above to Rebecca, but we'd also like that same information included on the Rule 306.e Certification letter as well. Thanks.

Doug Andrews
Oil & Gas Location Assessment Specialist - Northeast Area

COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

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

[Quoted text hidden]

Jeffrey Annable <jannable@petro-fs.com> Tue, Mar 10, 2015 at 11:15 AM
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Rebecca Treitz - DNR <rebecca.treitz@state.co.us>, Regulatory members <regulatory@petro-fs.com>

Hey Doug,

Attached is the COGCC Rule 306.e certification as well as the updated facility layout. Please let me know if there is anything else that you need.

Thanks,

Jeff Annable

Regulatory Technician

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Friday, March 06, 2015 1:18 PM
To: Jeffrey Annable
Cc: Rebecca Treitz - DNR; Regulatory members
Subject: Re: Long 22-B Pad

[Quoted text hidden]

2 attachments

Long 22-B Pad COGCC Rule 306.e. Completeness Certification to Director 3.9.15.pdf
112K

Long 22-B Pad 1N65W22 Facility Layout Drawing.pdf
610K