

STATE OF
COLORADO

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

COGCC Form 2A review of Bayswater Exploration's Hester Farms 31-H Pad location - Doc #400858904

2 messages

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

Mon, Jul 13, 2015 at 11:06 AM

Jeff,

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

1) Your Best Management Plan (BMP) #3 on Traffic Control/Access Roads indicates that "*traffic will be routed to minimize local interruption.*" Please provide additional site specific information on how the truck traffic will be routed. Is this part of any traffic control that is required by Weld County?

2) Your BMP #10 on Emissions mitigation/Green Completions indicates that "*in the anticipated absence of a viable gas sales line, the flowback gas shall be thermally oxidized in an emissions control device (ECD), which will be installed and kept in operable condition for at least the first 90-days of production pursuant to CDPHE rules.*" This is concerning as you have indicated in the Facilities list there will be sales meter, the nearby Noble Energy wells are currently selling gas, but you have indicated that gas may be thermally oxidized for at least the first 90-days. The COGCC wishes operators to tie into a gas sales line as soon as salable quality gas is produced and minimize the waste of this resource. Please provide a revised Green Completions BMP that also discusses Bayswater tying these wells into a gas sales line. Additionally I'd like to add the following Condition of Approval: "*Temporary emissions controls are only allowed during flowback. Salable quality gas shall be produced to a sales line or shut-in.*"

Please respond to this correspondence by August 13, 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

Jeffrey Annable <jannable@petro-fs.com>

Tue, Jul 14, 2015 at 8:12 AM

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

Hey Doug,

Please see Bayswater's response to your questions.

- 1) Bayswater will direct traffic to go both East and West on CR 76 to split traffic up. I will advise though that any oil and gas traffic heading east on CR 76 from the drilling and completion disturbance area should utilize CR 29 and not CR 27. The intersection of CR 27 and CR 74 is a tough intersection especially for large trucks turning.
- 2) Measures will be undertaken to reduce emissions of salable gas and condensate vapors during cleanout and flowback operations prior to the well being placed on production. Test separators, associated flow lines and sand traps shall be installed on-site to accommodate Green completions techniques. Bayswater is working with DCP and will tie into their system for gas transportation and sales.

Please let me know if this is sufficient.

Thanks,

Jeff Annable

Regulatory Technician

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

Sent: Monday, July 13, 2015 11:06 AM

To: Regulatory members

Subject: COGCC Form 2A review of Bayswater Exploration's Hester Farms 31-H Pad location - Doc #400858904

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