

STATE OF
COLORADO

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Milliken Investors doc no 400837985

6 messages

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Tue, Jun 9, 2015 at 4:28 PM

To: Callie Fiddes <cfiddes@gwogco.com>

Callie,

COGCC is in the process of reviewing the Form 2A for Milliken Investors HD Pad (doc no. 400837985). In order to complete our review, please address the following:

1. The 305.a.(2) letter does not meet the requirements of 305.c. by confirming the receipt of the notification letter. Also, a comparison of the list on the notification letter was sent does not appear to match the Weld County Assessor's office for Building Unit within the Buffer Zone. Please verify that all current Building Unit owners within the buffer zone were sent the 305.a.(2) notification letters.
2. In the siting rationale, the Building Units in the buffer zone are not discussed as if there is contact or mineral; what other areas outside the buffer zone were considered and why they would not work, i.e. switching the production area with the MLVT/Frac area.
3. The Form 2A indicates OBM is to be used and the Waste Management Plan mentions both OBM and water. Will both be used based on vertical vs. horizontal? If so, please provide a statement of disposal for both types to be added to the operator comments section.
4. Please provide site specific sound mitigation, specifically regarding the Building Units in the Buffer Zone.

Please let me know if you have any questions.

Thank you,

Rebecca

—

Rebecca Treitz
Oil and Gas Location Assessment Specialist
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Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

Callie Fiddes <cfiddes@gwogco.com>

Wed, Jun 17, 2015 at 2:36 PM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Hi Rebecca,

Attached is the amended letter. I also sent it in to Penny so she may have taken care of this part already.

Facilities were placed where they were per the surface owners request. They wanted facilities as close to the road as possible and not out in the middle of their field because they wanted to save as much land as

possible to be able to turn back to crop after operations are completed.

Only OMB will be used.

The nearest building unit is that of the surface owner. Since we are not in an exception zone, additional sound mitigation measures are not anticipated. However, if Great Western does receive noise complaints appropriate action, such as the use of sound walls or other measures, will be taken to mitigate the disturbance.

Thank you,

 Callie Fiddes

Regulatory Compliance Specialist

Direct: [303.398.0550](tel:303.398.0550)

Fax: [866.742.1784](tel:866.742.1784)

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From: Treitz - DNR, Rebecca [mailto:rebecca.treitz@state.co.us]
Sent: Tuesday, June 09, 2015 4:28 PM
To: Callie Fiddes
Subject: Milliken Investors doc no 400837985

[Quoted text hidden]

 **Operator Certification Rule 305.a. for Form 2A.pdf**
100K

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Callie Fiddes <cfiddes@gwogco.com>

Thu, Jul 9, 2015 at 1:54 PM

Callie,

Thank you for the revised 305.a. letter. Please provide a 306e certification for the Milliken location. Also, are there plans for the concrete flume to stay in place? This is considered a surface water body for the distance under the water resources section to be 0 ft. Otherwise the distance to the nearest surface water body on the 2A does not match the distances provided on the Location Drawing. Please confirm the distance to the nearest surface water body from the edge of disturbance.

The distance provided on the 2A to the nearest water well appears to be from the reference point and not the edge of disturbance. Please confirm the distance to the water well located nearest to the oil and gas location.

As indicated on the 2A, the location is in a water sensitive area. Please provide information on what type of tertiary containment will be used per Rule 604.c(3).B iii.
For the siting rationale, please provide COGCC with more information in regards to: Multi-well production facilities shall be located as far as possible from Building Units.

The reasons for selecting or not selecting a location may include, but are not limited to:

- a) Technical and economic feasibility,
- b) Environmental and topographic considerations,
- c) Right to construct considerations,
- d) Surface Owner and adjacent owner considerations,
- e) Cultural concerns such as: access, infrastructure, proximity to Building Units, and future development plans, etc,
- f) Public concerns, and
- g) Local government input.

Supporting information to include on the Siting Rational attachment may include;

- a) Figures, not limited to: tax assessor map screen shots, flood plain maps, property surveys, aerial images, maps or aerial images showing Building Units and depicting radii showing the relative position of the Oil and Gas Location.
- b) Narrative descriptions of interactions with Surface Owners, nearby Building Unit owners, Local Governments and neighborhood organizations.

Please let me know if you have questions.

Thank you,

Rebecca

[Quoted text hidden]

Callie Fiddes <cfiddes@gwogco.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Fri, Jul 10, 2015 at 12:50 PM

Hi Rebecca,

Attached is the certification. The distance to the nearest surface water feature can be changed to zero. The distance to the nearest water well needs to be changed to 430'. I'll have to get back to you on the additional containment we'll be using and with even more reasons why we placed facilities where we did.



Regulatory Compliance Specialist

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From: Treitz - DNR, Rebecca [mailto:rebecca.treitz@state.co.us]
Sent: Thursday, July 09, 2015 1:54 PM
To: Callie Fiddes
Subject: Re: Milliken Investors doc no 400837985

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 **Operator Certification Rule 306.e.pdf**
97K

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Callie Fiddes <cfiddes@gwogco.com>

Fri, Jul 10, 2015 at 4:05 PM

Callie,
Thank you for the information. I have updated the water resources area with the information you provided and attached the 306e. Based on having a surface water body transecting the location, please provide COGCC with the type of tertiary containment per Rule 604.c.(3)B. iii. that will be at the location.
Thanks,
Rebecca

[Quoted text hidden]

Callie Fiddes <cfiddes@gwogco.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Mon, Jul 13, 2015 at 4:00 PM

Hi Rebecca,

-

Regarding rule Rule 604.c.(3)B. iii. - The pond locations are either hydraulically cross or up gradient of the GWOG facilities, and thus surface spills are unlikely to contact the ponds. A berm will be placed along the south and western portions of the pad and production facilities.

Also, I've listed some more rationale for the placement of our facilities:

1. Milliken Investors requested that Great Western consolidate the production facilities to minimize the footprint on their property. The property is currently used as farmland and the locations chosen are the least intrusive to the current farming operations.
2. The closest piece of production equipment to any building unit is still over 500' away.
3. From a technical and engineering standpoint, the locations of the drill pads have to be located on the West side of Section 22-4N-67W because the minerals being developed are in N/2 of Section 22.
4. Other locations would put us off lease or had difficult topography that was unfeasible to build a pad on.
5. This location is also closer to the road providing more accessibility.
6. Placement of the pad was also worked around the location of the ponds situated to the south of our production facility pad.



Callie Fiddes

Regulatory Compliance Specialist

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From: Treitz - DNR, Rebecca [mailto:rebecca.treitz@state.co.us]

Sent: Friday, July 10, 2015 4:06 PM

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