

STATE OF
COLORADO

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

COGCC Form 2A review of Great Western's Leffler FE Pad location - Doc #400885770

4 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Regulatory Permitting <regulatorypermitting@gwogco.com>

Thu, Sep 24, 2015 at 10:20 AM

Allison & Callie,

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

1) In the Facilities section you have indicated there will be 15 wells on this proposed oil and gas location. However, your Multi-Well Plan only show 13 wells. Although the Location Drawing shows the remaining two being referred to as Open Slot A & B, it is important that the information on the Form 2A agrees with the accompanying attachments, especially for Designated Setback locations. Therefore I would like to change the number of wells in the Facilities section from 15 to 13.

2) In the Cultural Distance section you have indicated the nearest Building and Building Unit to a well is 916 feet and 967 feet, respectively. However, a review of your Location Drawing indicates the nearest Building is 834 feet (Line L4 on the Line Table) and the nearest Building Unit is 855 feet (Line L6 on the Line Table) from the nearest well (Leffler FE 20-182HN). The distance of 855 feet to the nearest Building Unit also agrees with what is indicated in the Siting Rationale. Therefore, I would like to change these two distances to match what is shown on the Location Drawing and Siting Rationale.

3) In the Exceptions section you have checked the Rule 604.a.(1)A Exception Location box. However, Rule 604.a.(1)A concerns Exception Locations in an Urban Mitigation Area. This proposed oil and gas location, while in an Exception Zone, is not within an Urban Mitigation Area. Therefore, I would like to uncheck that Exception box.

4) Your Noise mitigation Best Management Practice (BMP) only mentions mitigating noise from the drilling rig and completion equipment. However, you have indicated there will be two gas compressors on this proposed oil and gas locations and appear to be within 1,000 feet of the nearest Building Unit. Therefore, please provide me with a revised Noise mitigation BMP that addresses how Great Western will mitigate noise from these compressors.

5) Because this proposed oil and gas location is on irrigated crop land, the Reference Area Map & Reference Area Pictures attachments are not required. Therefore, I would like to remove them from the Form 2A.

Please respond to this correspondence by October 24, 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
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

Regulatory Permitting <regulatorypermitting@gwogco.com>

Mon, Sep 28, 2015 at 4:03 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Regulatory Permitting
<regulatorypermitting@gwogco.com>

- 1.) We have been told to include and not to include open slots in the well count. Sorry for the confusion we will not include them moving forward. This change is ok.
- 2.) You are correct. This change is ok.
- 3.) You are Correct. This change is ok.
- 4.) During the drilling phase, Great Western plans to construct sound/visual walls that will be placed along the Northern, Southern, Eastern and Western edges of the pad. This will also assist to block out any lighting from nearby occupied structures. Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings. Sealed tanks with pressure relief valves and emissions controls will also be utilized during the production phase.
- 5.) This is okay to remove.

Let me know if you need any other information

**Allison Linz**

Regulatory&Permitting Technician

Great Western Operating Company, LLC

1801 Broadway, Suite 500

Denver, CO 80202

Direct: [303.398.0355](tel:303.398.0355)Cell: [913.314.2270](tel:913.314.2270)

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

Sent: Thursday, September 24, 2015 10:20 AM

To: Regulatory Permitting

Subject: COGCC Form 2A review of Great Western's Leffler FE Pad location - Doc #400885770

Allison & Callie,

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

1) In the Facilities section you have indicated there will be 15 wells on this proposed oil and gas location. However, your Multi-Well Plan only show 13 wells. Although the Location Drawing shows the remaining two being referred to as Open Slot A & B, it is important that the information on the Form 2A agrees with the accompanying attachments, especially for Designated Setback locations. Therefore I would like to change the number of wells in the Facilities section from 15 to 13.

2) In the Cultural Distance section you have indicated the nearest Building and Building Unit to a well is 916 feet and 967 feet, respectively. However, a review of your Location Drawing indicates the nearest Building is 834 feet (Line L4 on the Line Table) and the nearest Building Unit is 855 feet (Line L6 on the Line Table) from the nearest well (Leffler FE 20-182HN). The distance of 855 feet to the nearest Building Unit also agrees with what is indicated in the Siting Rationale. Therefore, I would like to change these two distances to match what is shown on the Location Drawing and Siting Rationale.

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5) Because this proposed oil and gas location is on irrigated crop land, the Reference Area Map & Reference Area Pictures attachments are not required. Therefore, I would like to remove them from the Form 2A.

Please respond to this correspondence by October 24, 2015. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Regulatory Permitting <regulatorypermitting@gwogco.com>

Tue, Oct 13, 2015 at 2:25 PM

Allison & Callie,

Now that the Public Comment period has ended, please send me a letter that certifies Great Western's compliance with COGCC Rule 306.e. If any meetings and/or consultations were held please indicate so and what their outcome was.

Also, the City of Greeley has placed a comment on this Form 2A. While this location is not within the city limits of Greeley, we would like Great Western to provide a response to Greeley's comment. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801

Denver, CO 80203

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Regulatory Permitting <regulatorypermitting@gwogco.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Oct 14, 2015 at 9:20 AM

Doug,

Attached is a letter that complies with Rule 306.e.

Great Western has noted the LGD's comments from the City of Greeley and taken other locations into account for the placement of our pad. However, due to the following reasons Great Western will not be moving the location of the pad.

1. The surface owner owns the building units to the West of the pad.
2. These above mentioned buildings are not occupied
3. The surface owner wishes to keep the pad out of his center pivot to the North
4. There is a water line to the North that the landowner does not want to set tanks over.
5. The current location of the Leffler Pad and Production Facilities provides the least interference with the landowner's current farming operations.
6. The current land owner would like his minerals underlying the NE/4 and the E/2NW developed, which is best for the development of this pad.
7. The geology findings support an East-West orientation is best for the development of this pad.



Allison Linz

Regulatory&Permitting Technician

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

Sent: Tuesday, October 13, 2015 2:25 PM

To: Regulatory Permitting

Subject: Re: COGCC Form 2A review of Great Western's Leffler FE Pad location - Doc #400885770

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Operator Certification Rule 306.e.pdf

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