

STATE OF  
COLORADO

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

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**COGCC Form 2A review of Extraction Oil & Gas' Stromberger 22-E Pad - Doc #400774299**

2 messages

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

Fri, Oct 30, 2015 at 10:49 AM

To: Regulatory members &lt;regulatory@petro-fs.com&gt;

Cc: Christi Ng - DNR &lt;Christi.Ng@state.co.us&gt;

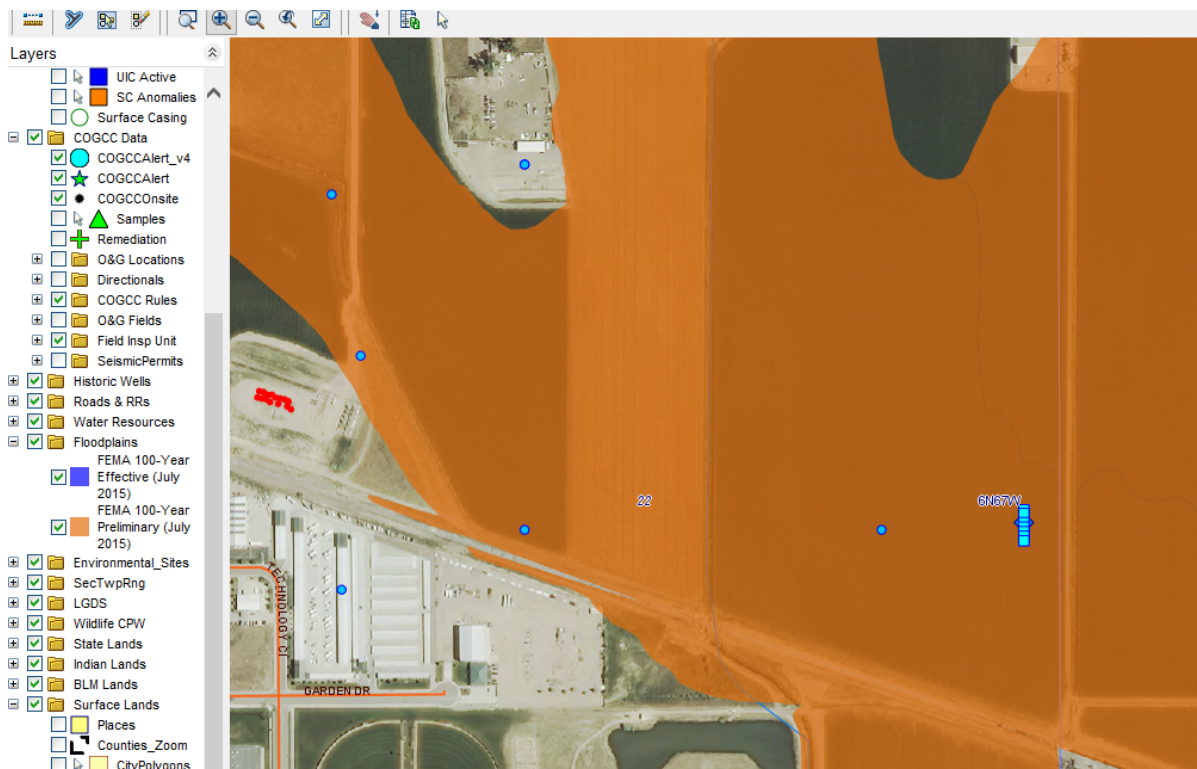
Jeff,

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

1) It appears the Surface & Minerals section was not filled out completely. While you have indicated the right to construct this proposed Oil and Gas Location is granted by a Surface Use Agreement (SUA), no Surface Owner information nor a copy of the executed SUA were included on the Form 2A. Please provide these items and I will add it to the Form 2A.

2) In the Water Resources section you have indicated the nearest water well is CDWR Permit #26663 located 513 feet west of the proposed Oil and Gas Location as shown on the Location Drawing and Hydrology Map. However, during my review the permit for that water well indicates it was abandoned in 1996. The nearest water well whose permit indicates it has not been abandoned appears to be the water well that was used for the estimated depth to groundwater (CDWR Permit #318-RD) located 1,472 feet to the northeast. You have shown water well Permit #26663 on the Location Drawing, but was its location and existence field verified? If not I would like to change the distance to the nearest water well to 1,472 feet and have you send me a revised Location Drawing.

3) In the Water Resources section you have indicated the proposed Oil and Gas Location is **not** within a floodplain. However, during my review, this proposed Oil and Gas Location lies within a FEMA mapped 100-year preliminary floodplain (as of July 2015). See the attached screenshot. Even if a proposed Oil and Gas Location is within a preliminary mapped floodplain, we wish operators to comply with COGCC Rule 603.g. (Anchoring Requirements) and 603.h. (Floodplain Requirements). Therefore, I would like to change that question from NO to YES and have you provide me with BMPs that discuss Extraction's compliance with these two COGCC Rules in regards to construction and operations activities.



4) The Town of Windsor has placed a Public Comment on all the associated Form 2 APDs (but not this Form 2A) requesting a Drilling and Site Improvement Plan from Extraction. However, it appears that this Oil and Gas Location is not currently within the Town of Windsor limits but unincorporated Weld County. Has Extraction been in contact with the Town of Windsor concerning their request for a Drilling and Site Improvement Plan?

Please respond to this correspondence by November 30, 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](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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

Mon, Nov 2, 2015 at 12:50 PM

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

Cc: Christi Ng - DNR <Christi.Ng@state.co.us>

Hey Doug,

My apologies for not attaching the SUA to the Form 2A. Please find the SUA attached. Also please find my

comments to each of your other questions below.

Thanks,

Jeff Annable

Regulatory Analyst

Petroleum Field Services LLC

Office: 303-928-7128

Fax: 303-218-5678

7535 Hilltop Circle

Denver, CO 80221

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

**Sent:** Friday, October 30, 2015 10:50 AM

**To:** Regulatory members

**Cc:** Christi Ng - DNR

**Subject:** COGCC Form 2A review of Extraction Oil & Gas' Stromberger 22-E Pad - Doc #400774299

Jeff,

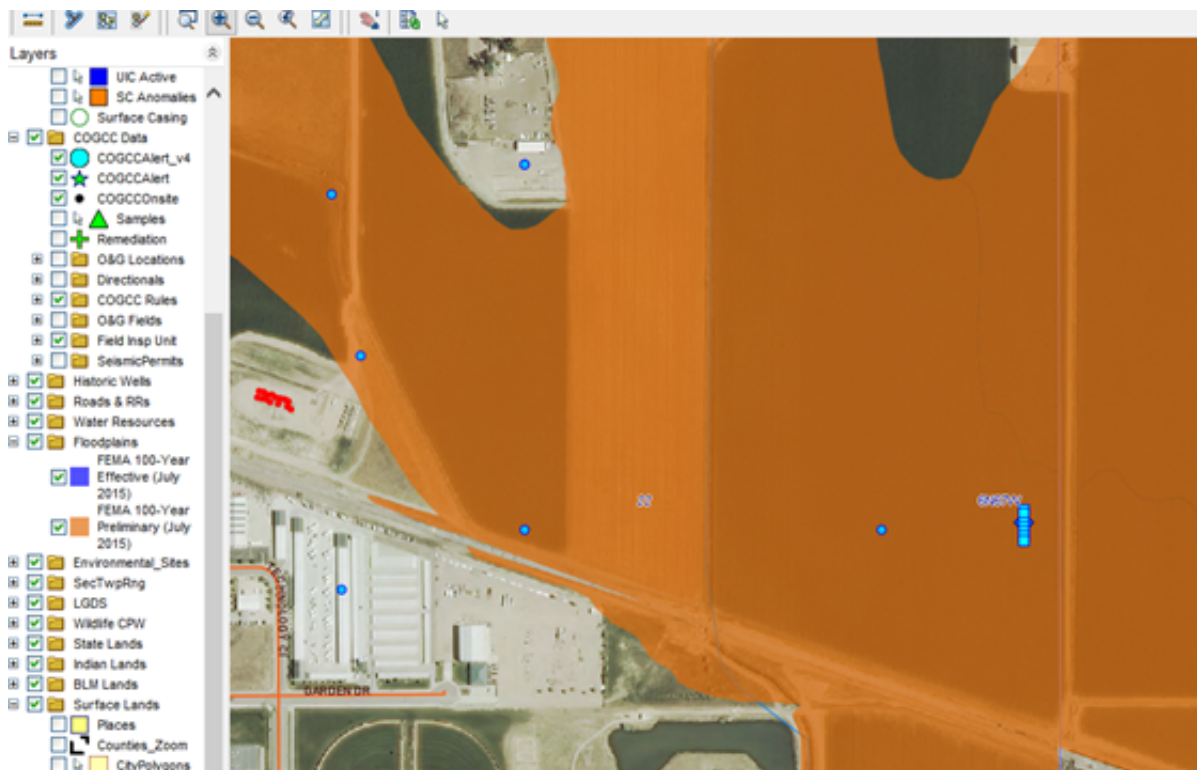
I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) It appears the Surface & Minerals section was not filled out completely. While you have indicated the right to construct this proposed Oil and Gas Location is granted by a Surface Use Agreement (SUA), no Surface Owner information nor a copy of the executed SUA were included on the Form 2A. Please provide these items and I will add it to the Form 2A. **Attached**

2) In the Water Resources section you have indicated the nearest water well is CDWR Permit #26663 located 513 feet west of the proposed Oil and Gas Location as shown on the Location Drawing and Hydrology Map. However, during my review the permit for that water well indicates it was abandoned in 1996. The nearest water well whose permit indicates it has not been abandoned appears to be the water well that was used for the estimated depth to groundwater (CDWR Permit #318-RD) located 1,472 feet to the northeast. You have shown water well Permit #26663 on the Location Drawing, but was its location and existence field verified? If not I would like to change the distance to the nearest water well to 1,472 feet and have your send me a revised Location Drawing. **Attached revised location drawing**

3) In the Water Resources section you have indicated the proposed Oil and Gas Location is **not** within a floodplain. However, during my review, this proposed Oil and Gas Location lies within a FEMA mapped 100-year preliminary floodplain (as of July 2015). See the attached screenshot. Even if a proposed Oil and Gas Location is within a preliminary mapped floodplain, we wish operators to comply with COGCC Rule 603.g. (Anchoring Requirements) and 603.h. (Floodplain Requirements). Therefore, I would like to change that question from NO to YES and have you provide me with BMPs that discuss Extraction's compliance with these two COGCC Rules in regards to construction and operations activities. **Please change the answer to yes and add the following BMPs:**

- All equipment will be anchored to the extent necessary to resist flotation, collapse, lateral movement, or subsidence.
- Extraction will install an engineered containment system around the tank battery. The containment system is constructed of a perimeter of walls that are post driven into the ground around a flexible geotextile base. All components are then sprayed with a polyurea liner technology. This liner technology maintains impermeability and puncture resistance under exposure to UV rays, weather extremes, and chemicals commonly encountered in oil and natural gas production, and provides seamless protection. In addition to the engineered containment system, Extraction will install bollards on the upstream end of the tank battery as an added safety measure. The bollards will provide added protection to the tank battery in the event of a flood in which objects and debris may be floating downstream. The bollards will be constructed of steel pipe filled with concrete and will protect the containment system from being struck and compromised by floating debris.



4) The Town of Windsor has placed a Public Comment on all the associated Form 2 APDs (but not this Form 2A) requesting a Drilling and Site Improvement Plan from Extraction. However, it appears that this Oil and Gas Location is not currently within the Town of Windsor limits but unincorporated Weld County. Has Extraction been in contact with the Town of Windsor concerning their request for a Drilling and Site Improvement Plan?

Operator acknowledges that this location is in close proximity to the Town of Windsor and has read through the comments posted. Operator will contact the Town of Windsor LGD to discuss, however, the site is located within Weld County on property zoned AG (agriculture) and therefore oil and gas operations are considered a use by right.

Please respond to this correspondence by November 30, 2015. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area

[Redacted signature]

1120 Lincoln St., Suite 801

Denver, CO 80203

[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)

303-894-2100 Ext. 5180

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**2 attachments**



**STROMBERGER SUA - NE4 SEC 22 6N-67W - Highlighted.pdf**

8220K



**STROMBERGER 22-E PAD 6N67W22 Location Drawing.pdf**

1147K