



**FW: COGCC Form 2A review of Whiting's Horsetail 18-0733H location - Doc #400933540**

1 message

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Wed, Dec 30, 2015 at 10:28 AM

To: "doug.andrews@state.co.us" <doug.andrews@state.co.us>

Cc: Randy Willey <randal.willey@whiting.com>, "Michael L. Brown" <ml\_brown@bresnan.net>

Mr. Andrews,

We have provided responses to your questions below in red. If you have any additional questions or need further clarification please do not hesitate to call or e-mail me. Thank you.

**Kyle Waggoner, PG**

Field Regulatory Manager

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Michael,

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

1) Per COGCC Rule 303.b.(3)C, please provide a description of all oil, gas, and/or water pipelines on this location. What we are looking for is a description of pipelines that run from the well to the separators to the tanks.

The following is a description of all the oil, gas, and water pipelines on this location.

- Emulsion flow line from wellhead to Separator – 145' SCH 80 3" welded
- Oil production line from Treater to tanks – 145' SCH 80 3" welded
- Water production line from Treater to tanks – 170' 3" poly SDR11
- Recycle line from tanks to Treater – 195' SCH 80 2" welded
- Produced gas flare line from Treater to flare – 350' 2" SCH 80 welded
- Tank Vapor line from tanks to combustor – 165' 3" poly SDR11
- Jet pump line from water tank to wellhead – 160' 2" SCH 80 welded
- Gas supply line from treater to engine on pumping unit – 185' 1" poly SDR11
- Gas supply line from treater to water tank – 155' 1" poly SDR11
- Gas supply line from corridor in tank battery to flare – 205' 1" poly SDR11

2) In the Cultural Distance section you have indicated the nearest Building Unit to a well and production facility is greater than a mile. However, during my review it appears the nearest Building is a residence (Building Unit). Therefore, I would like to change the distance to the nearest Building Unit to match the distances to the nearest Building (3,721 feet from a well and 3,575 feet from a production facility)

Please make this change as described.

3) Comparing the Facilities section on this Amended Form 2A to the original Form 2A it appears that Whiting is/has added one separator, one VOC Combustor, and one Flare along with the Freshwater Pit. Please confirm if this is correct.

Yes, this is correct.

4) Because Whiting has indicated they have already constructed the freshwater pit (May 2014) and that size of the location has expanded, please provide me with current Location Pictures and I will attach them to this Amended Form 2A.

See attached.

5) You have included an Operator comment that indicates the Freshwater Pit was constructed in May 2014. Based on that, what exactly is the date planned to commence construction of 11/15/15 refer to?

I used 11/15/15 because the form required a future date to allow submittal.

6) You have included an Operator comment that indicates the Freshwater Pit was constructed in May 2014, however, the well on this location has already been drilled and completed and has been producing since 2012. The nearby Whiting Horsetail 18-0713H well to the west has been producing since September 2013. Please provide specifics as to what this Freshwater Pit is being used for.

Wells located on the following pads, Horsetail 07E, Horsetail 07F, Horsetail 07G, Horsetail 07H, Horsetail 08A, Horsetail 08B, Horsetail 08C, Razor 12F, Razor 12G, Razor 12H will use this freshwater and additional wells to be determined. Trucks or temporary surface waterlines will be used to transport freshwater from this pit to the well locations. This Freshwater Pit is part of a system of interlinked freshwater pits and transfer lines. This system was constructed to supply fresh water for drilling and completion operations while minimizing truck traffic. In 2015 approximately 87,000 truck trips for fresh water were eliminated due to this system.

7) You have included an Operator comment that indicates the Freshwater Pit was constructed in May 2014 and the size of the disturbance is 9.41 acres during construction and 9 acres after interim reclamation. This is very little interim reclaimed land. What are Whiting's long term plans for this amount of additional disturbance that only 0.6 acres will be reclaimed?

See attached Cut & Fill diagram. With the location of production equipment and the freshwater pond there is little room for interim reclamation. When the pond is no longer in use and is filled back in then the interim reclamation area will be approximately 6.5 acres. The freshwater pond is set to be used indefinitely and not planned to be reclaimed for years.

8) You have included an Operator comment that indicates the Freshwater Pit was constructed in May 2014. The original Form 2A for this location (Document #400200271 approved in September 2011) indicates the size of the location during construction was to be 4 acres. A Form 4 Sundry (Document #2613843) was approved to increase the size of the disturbed area from 4 acres to 5.5 acres. This amended Form 2A is asking for 9.41 acres of disturbance. This is almost double the approved surface disturbance. Per COGCC Rule 303.b.(1)B & C, an approved Form 2A is required when surface disturbance for expanding an existing Oil and Gas Location is needed and the addition of a pit to any existing Oil and Gas Location. A review of our files does not indicate any approved Form 2As for this increase in surface disturbance and addition of a pit. Therefore, it appears Whiting is in violation of COGCC Rules and this matter will be forwarded to the COGCC Enforcement group for follow-up action.

Please respond to this correspondence by January 1 ,2016. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



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**3 attachments**

-  **Horsetail 18 Pond D Cross Sections.pdf**  
181K
-  **Horsetail 18 Pond D Cut & Fill.pdf**  
253K
-  **Horsetail 18 -0733H Location Pictures revised 12-3-15.pdf**  
151K