

STATE OF  
COLORADO

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

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**RE: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Wacker 5N64W10G location - Doc #401052608**1 message

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**Kelsi Welch** <Kelsi.Welch@pdce.com>

Fri, Jul 8, 2016 at 1:43 PM

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

Hi Doug,

Please see my responses below in red and let me know if you need anything additional.

Thanks!

Kelsi

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]**Sent:** Thursday, July 7, 2016 1:23 PM**To:** Kelsi Welch <[Kelsi.Welch@pdce.com](mailto:Kelsi.Welch@pdce.com)>**Subject:** [EXTERNAL] :COGCC Form 2A review of PDC Energy's Wacker 5N64W10G location - Doc #401052608

Kelsi,

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

1) As we discussed on the telephone this morning, the existing PDC Wacker #1 well is located between the proposed new wells and production facilities. We do not wish to create in our system a new Oil & Gas Location on top of an existing one. As the proposed disturbed area will encompass the existing Wacker #1 well, I will change this 2A from a New Location to Amending Existing Location ID #323125. You also indicated that the existing nearby tank battery for the Wacker #1 well will be removed and the Wacker #1 well will produce to the new production facilities. I'd like to add an Operator Comment to that affect on this Form 2A. **Yes, I can confirm that we**

will be tying the Wacker 1 into the new facilities. Please go ahead and change the 2A to amend the existing location and add the operator comment.

2) Based on my Comment #1 above, I'd like to update the Facilities list to indicate there will be 12 wells on this Oil & Gas Location. Agreed.

3) In the Facilities section you have indicated there will be 11 VOC Combustors. On the Facility Layout Drawing, only 10 are depicted. Please confirm the number of VOC Combustors that will be on this Oil & Gas Location. Additionally, does the Facilities list as submitted take into account the existing Wacker #1 well will produce to these new production facilities? There should only be 10 VOC combustors, sorry about that mistake. In addition, can we add 1 separator and 1 tank to the equipment count to account for the Wacker 1 production?

4) In the Drilling Program section you have indicated that oil based drilling fluids will be used. Typically, this is not the case with PDC. Please confirm if oil based drilling fluids will be used. If yes, the disposal methods must be revised as oil based fluids and cuttings are not allowed to be disposed of via Land Application and Beneficial Reuse. This is also a mistake, I apologize. I recently found out that we have no plans to use oil-based fluid so the answer to that question should be no. I have attached the correct waste management plan in addition.

5) You have completed a portion of the Plant Community section. However, because this location is on irrigated cropland, completing the Plant Community section is not required. Therefore, I would like to clear out those entries. Agreed.

6) You have indicated there will be 6 MLVTs and have provided the size, manufacturer, and anticipated timeframe they will be on the Oil & Gas Location. Please also provide me with a BMP/statement indicating PDC will comply with the COGCC Policy on the Use of MLVTs.

#### MLVT Certification

PDC Energy Inc. hereby certifies to the Director that the Modular Large Volume Tanks, utilized for the afore mentioned location, will be designed and implemented consistent with the Colorado Oil and Gas Conservation Commission policy dated June 13, 2014.

7) In your BMP #1 (604.c.(2)E. - Multiwell Pads:) you have the following statement "*PDC will also be able to utilize two existing PDC batteries...*" I am unsure exactly what is meant by this. Please provide some additional clarification as to what PDC Energy's intentions are regarding this. Would it be possible to remove this phrasing from the BMP? I have spoken with my team and it seems that part was added in error. However, I believe the rest of the phrasing is correct.

8) Now that the Public Comment period has ended, please provide me with a letter certifying PDC Energy's compliance with COGCC Rule 306.e. If any meetings or consultations were requested and/or held, please also include their outcome. **Please see attached.**

Please respond to this correspondence by August 7, 2016. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



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**2 attachments**



**E&P Waste Management Plan\_12-14-2015.pdf**

8366K



**306e Meeting Requirements Certification Letter to Director\_Wacker 5N64W1....pdf**

87K