

STATE OF
COLORADO

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

RE: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Ottenhoff 5N64W29CR location - Doc #4010490221 message

Venessa Langmacher <Venessa.Langmacher@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Jul 13, 2016 at 11:32 AM

Hi Doug!

Please see my comments below:

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Wednesday, July 6, 2016 2:25 PM
To: Venessa Langmacher <Venessa.Langmacher@pdce.com>
Subject: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Ottenhoff 5N64W29CR location - Doc #401049022

Venessa,

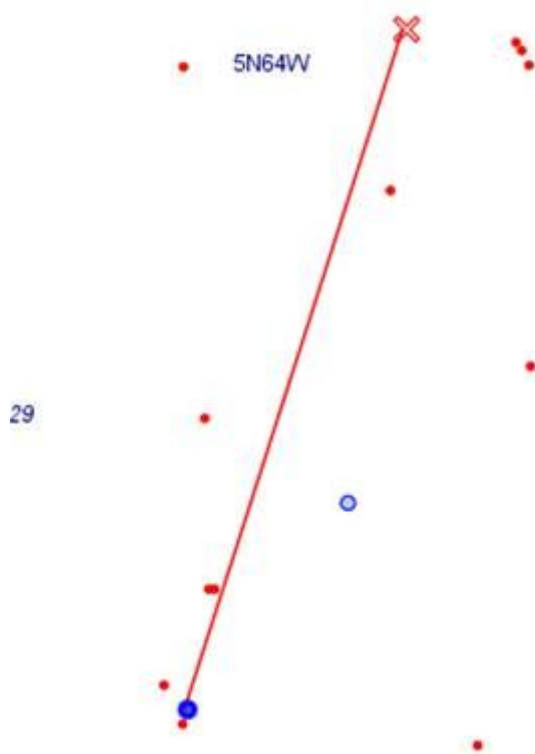
I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Thank you for the additional drawing that depicts the permanent access road PDC has agreed to construct so the nearby Building Unit owner can continue to access their home once this location is constructed. We were greatly concerned with what seemed like they would have to drive through the production facility. I have attached the exhibit you provided to this Form 2A and left a comment addressing it. [Agreed](#)

2) During my review there now appears to be a small building next to the cell/radio tower to the northeast. This building appears to be the nearest Building to this proposed Oil & Gas Location at distances of approximately 875 feet from the nearest well and approximately 650 feet from the nearest production facility. Therefore, I would like to update those two cultural distances. Please let me know if that is acceptable. [Agreed](#)

3) During my review, I identified two registered Child Care Centers in the town of Kersey. The nearest being approximately 4,875 feet from the nearest well and approximately 4,500 from the nearest production facility. As Child Care Centers are considered High Occupancy Building Units per COGCC definition, I would like to update those two cultural distances, Please let me know if that is acceptable. [Agreed](#)

4) In the Water Resources section, you identified the nearest surveyed water well as Permit #134898 at a distance of 2,789 feet. During my review that well is spotted approximately 1,900 feet to the south; however, it status is listed as UNKNOWN. Where did you come up with the distance of 2,789 feet to the nearest water well? [The permit number should actually be 5-GX – Receipt 3609856H. There is not much info on the DWR site but this well was actually surveyed by Washburn and the surveyed distance is 2789’.](#)

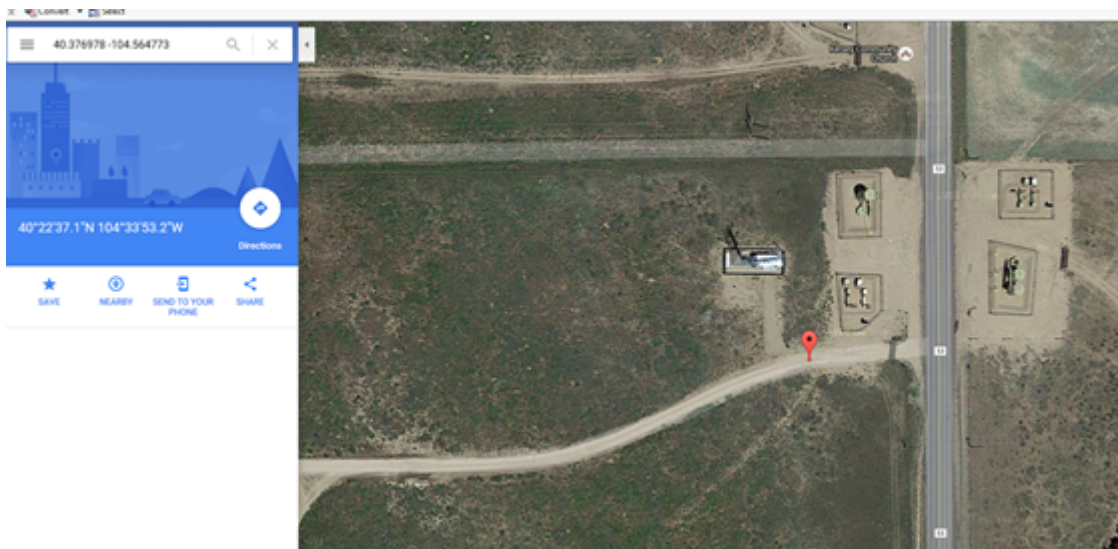


5) In the Other Facilities section you have indicated there will be 8 temporary water tanks. Will these temporary tanks be bermed the same as the permanent tank battery? If not, what measures will PDC take to mitigate a spill or release from these temporary tanks? Will there be vapor emissions and odor controls associated with these temporary tanks the same as for the permanent tank battery? If not, how will PDC mitigate any vapor or odor emissions from these tanks? [Yes, they will be bermed and have the same vapor emissions and odor controls as the permanent facilities.](#)

604c.(2).G. Berm Construction: Containment berms for Permanent and Temporary Equipment shall be constructed of steel rings with a geosynthetic liner, designed and installed to prevent leakage and resist degradation from erosion or routine operation. All berms will be visually checked periodically to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Due to a downgradient surface water body within 500', tertiary containment (such as an earthen berm or the like), will be installed around Production Facilities.

805.b(1)-(c) Odors and Dust: Oil and gas facilities and equipment (PERMANENT AND TEMPORARY) will operate in a manner that odors and dust do not constitute a nuisance or hazard to public welfare. Odors: Oil and gas operations will be in compliance with the Department of Public Health and Environment, Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. Dust; PDC will employ practices for control of fugitive dust caused by operations include but not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic.

6) Your Reference Area Map lists the Reference Area as being located as Latitude 40.376978 / Longitude -104.564773. When I plot this location it maps as being in the middle of an existing access road. See the attached screenshot from Google Maps. This also agrees with what is shown on your Reference Area Pictures. Per the COGCC's Attachment Guidance on Reference Areas, the Reference Area shall be an area that is undisturbed by oil and gas operations. The chosen Reference Area does not appear to be acceptable as the ground is currently disturbed and we do not want operators to used disturbed ground (in this case a gravel access road) as the reference for setting their reclamation standards. Please provide revised Reference Area Map & Pictures attachments that identifies an area that is currently not disturbed. [Attached](#)



Please respond to this correspondence by August 6, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

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7/13/2016

State.co.us Executive Branch Mail - RE: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Ottenhoff 5N64W29CR location - Doc #401049022



Ottenhoff 5N64W29CR Reference Area Map r1.pdf

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