

STATE OF
COLORADO

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

COGCC Form 2A review of Synergy Resources' Orr State 40-36 Pad location - Doc #401102534

8 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Erin Ekblad <eeekblad@syrginfo.com>

Wed, Nov 9, 2016 at 2:09 PM

Erin,

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

- 1) In the Cultural Setback Distance section you have indicated the distance from the nearest well to a Public Road, Above Ground Utility, and Property Line is 522 feet, 509 feet, and 534 feet, respectively. During my review it appears these distances are from the chosen reference well (Orr 36C-32-M). This is not the closest well to those three cultural features. The line of wells that run north to south are closer to these three cultural features with distances of 222 feet to the Public Road, 209 feet to the Above Ground Utility, and 234 feet to the Property Line. Therefore, I would like to change these three distances to reflect this.
- 2) In the Cultural Setback Distance section you have indicated the distance from the nearest production facility to a Building and Building Unit is 1,902 feet and 1,736 feet, respectively. During my review it appears those distances are reversed as the nearest Building Unit is further away than the nearest Building from a production facility. Please confirm these two cultural distances and if need be I can switch them for you.
- 3) In the Water Resources section you have indicated the nearest downgradient surface water feature is 254 feet (the Cache La Poudre River). However, a review of your various drawings, USGS topographic maps, and aerial photos indicate the Jones Ditch which separates the well pad from the production facility should be considered the nearest downgradient surface water feature. Per your Hydrology Map it is 195 feet from your reference well; therefore, I would like to change that distance from 254 feet to 195 feet.
- 4) In the Water Resources section you have indicated the nearest water well (Permit #280592) is 84 feet away. At this distance it should appear on your Location Drawing, but no water wells are depicted. Was this water identified in the field as being 84 feet away? If yes, please revise the Location Drawing to depict it. If it is not located 84 feet away, please provide me with a revised distance to the nearest well.
- 5) Due to the proximity of surface water features (Jones Ditch and the Cache La Poudre River) and possible shallow groundwater (17 feet), I would like to change the Water Resources section to indicate YES, this location is a Sensitive Area.
- 6) You have included a Traffic Control BMP that indicates "*If required by the local government, a traffic plan shall be coordinated...*" Please confirm if the local government does or does not require a traffic plan for this proposed development and I will update this BMP to so indicate.
- 7) You have included a Drilling and Completion Operations BMP that indicates pit level indicators will be used on location. As you have indicated in the Facilities section there will be no pits, please clarify what is meant by this BMP.
- 8) In the Land Use section you have indicated this proposed Oil & Gas Location is on dry land. When land use is any type of Cropland, Reference Area Map & Pictures attachments are not required. Therefore, I would like to remove those two attachments from this Form 2A.

9) You have included an Operator Comment indicating Synergy will comply with our MLVT Policy. I would like to copy that statement as an operator BMP on this 2A as well.

10) A review of the August 29, 2016 Initial Site Assessment from Quandary Consultants indicates that Synergy will place a permanent sound wall along the north side of the production facility to reduce visual impacts to the Poudre River Trail. Is this still true? If yes, then please provide me with an updated Visual Impacts BMP that incorporates this mitigation measure, being sure to include a description of this wall.

11) If I remember correctly, when discussing this location with you prior to submittal you indicated the existing Noble State M #36-9 well and tank battery would be abandoned and removed. Will you provide me with an Operator Comment to include on the Form 2A that summarizes Synergy's plans regarding this existing Noble well and tank battery.

Please respond to this correspondence by December 9, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



1120 Lincoln St., Suite 801
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

Erin Ekblad <EEKBLAD@SYRGINFO.COM>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Fri, Nov 11, 2016 at 10:02 AM

Good afternoon Doug,

Answers are listed in RED. There are a couple I am still working on with our Survey company. I highlighted those questions in Yellow. You should have those by next week and we will let you know about the Traffic plan soon.

Have a good weekend!

Erin Ekblad | Manager of Regulatory Affairs

Synergy Resources Corporation

1625 Broadway; Suite 500

Denver, CO 80202

Direct: [720.616.4319](tel:720.616.4319)

Cell: [303.550.2375](tel:303.550.2375)



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

Sent: Wednesday, November 09, 2016 2:10 PM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Subject: COGCC Form 2A review of Synergy Resources' Orr State 40-36 Pad location - Doc #401102534

Erin,

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

1) In the Cultural Setback Distance section you have indicated the distance from the nearest well to a Public Road, Above Ground Utility, and Property Line is 522 feet, 509 feet, and 534 feet, respectively. During my review it appears these distances are from the chosen reference well (Orr 36C-32-M). This is not the closest well to those three cultural features. The line of wells that run north to south are closer to these three cultural features with distances of 222 feet to the Public Road, 209 feet to the Above Ground Utility, and 234 feet to the Property Line. Therefore, I would like to change these three distances to reflect this.

YES: Please change.

2) In the Cultural Setback Distance section you have indicated the distance from the nearest production facility to a Building and Building Unit is 1,902 feet and 1,736 feet, respectively. During my review it appears those distances are reversed as the nearest Building Unit is further away than the nearest Building from a production facility. Please confirm these two cultural distances and if need be I can switch them for you.

3) In the Water Resources section you have indicated the nearest downgradient surface water feature is 254 feet (the Cache La Poudre River). However, a review of your various drawings, USGS topographic maps, and aerial photos indicate the Jones Ditch which separates the well pad from the production facility should be considered the nearest downgradient surface water feature. Per your Hydrology Map it is 195 feet from your reference well; therefore, I would like to change that distance from 254 feet to 195 feet.

Yes it should be the Jones Ditch @ 195

4) In the Water Resources section you have indicated the nearest water well (Permit #280592) is 84 feet away. At this distance it should appear on your Location Drawing, but no water wells are depicted. Was this water identified in the field as being 84 feet away? If yes, please revise the Location Drawing to depict it. If it is not located 84 feet away, please provide me with a revised distance to the nearest well.

5) Due to the proximity of surface water features (Jones Ditch and the Cache La Poudre River) and possible shallow groundwater (17 feet), I would like to change the Water Resources section to indicate YES, this location is a Sensitive Area.

Yes this is fine

6) You have included a Traffic Control BMP that indicates "*If required by the local government, a traffic plan shall be coordinated...*" Please confirm if the local government does or does not require a traffic plan for this proposed development and I will update this BMP to so indicate.

7) You have included a Drilling and Completion Operations BMP that indicates pit level indicators will be used on location. As you have indicated in the Facilities section there will be no pits, please clarify what is meant by this BMP.

604.c.(2).K. Pit level Indicators - For the rig pits (steel tanks) we utilize the Pason PVT (Pit Volume Totalizer) system in conjunction with the EDR (Electronic Depth Recorder) systems on both rigs which incorporate digital recording of pit volumes, settable alarms for gain and loss so we are able to track the pit volumes. These items are standard on a 5K system which is what we are permitting for.

8) In the Land Use section you have indicated this proposed Oil & Gas Location is on dry land. When land use is any type of Cropland, Reference Area Map & Pictures attachments are not required. Therefore, I would like to remove those two attachments from this Form 2A.

OK

9) You have included an Operator Comment indicating Synergy will comply with our MLVT Policy. I would like to copy that statement as an operator BMP on this 2A as well.

OK

10) A review of the August 29, 2016 Initial Site Assessment from Quandary Consultants indicates that Synergy will place a permanent sound wall along the north side of the production facility to reduce visual impacts to the Poudre River Trail. Is this still true? If yes, then please provide me with an updated Visual Impacts BMP that incorporates this mitigation measure, being sure to include a description of this wall.

“We will provide a permanent sound wall around the compressors for noise mitigation.”

11) If I remember correctly, when discussing this location with you prior to submittal you indicated the existing Noble State M #36-9 well and tank battery would be abandoned and removed. Will you provide me with an Operator Comment to include on the Form 2A that summarizes Synergy's plans regarding this existing Noble well and tank battery.

“Synergy will coordinate with Noble to P&A the Noble State M #36-9 well prior to drilling operations in late December. However if Noble is unable to P&A prior to the December start, Synergy and Noble will coordinate a window between drilling and completions operations to P&A said well. In this case, during construction and drilling operations, Synergy and Noble will coordinate the shutting in of the said well and place concrete barriers around the wellhead.”

Please respond to this correspondence by December 9, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



1120 Lincoln St., Suite 801

Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Erin Ekblad <eekblad@syrinfo.com>

Fri, Nov 11, 2016 at 10:16 AM

Erin,

Thanks for the quick reply. I have some follow-up to your response to my Comment #10. I appreciate the additional noise mitigation for the compressors but I'm asking if the entire north side of the production facility will have a wall for **visual impact mitigation** as indicated in the Initial Site Assessment from Quandary.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Erin Ekblad <eeekblad@syrginfo.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Nov 14, 2016 at 8:28 AM

I am working with CPW and Quandary, but we might revise the attachment with the approval of CPW.

As far as number 6 below regarding Traffic Control, I hear from the field late Friday and wanted to provide additional details:

Our access permit to location is our notification to Weld County, the city of Greeley, or whatever municipality we need for approved traffic routes, and traffic control.

All traffic plans are approved per our access permit, it is part of our USR if we have one, or part of the access permitting process.

FYI all of the contractors that we used have a blanket traffic control plan and permit with the county.

Erin Ekblad | Manager of Regulatory Affairs

Synergy Resources Corporation

1625 Broadway; Suite 500

Denver, CO 80202

Direct: 720.616.4319

Cell: 303.550.2375



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

Sent: Friday, November 11, 2016 10:17 AM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Subject: Re: COGCC Form 2A review of Synergy Resources' Orr State 40-36 Pad location - Doc #401102534

[Quoted text hidden]

Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Mon, Nov 14, 2016 at 3:06 PM

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

Cc: Brandon Lorenz <BLorenz@SYRGINFO.COM>

Good afternoon Doug,

Please see the updated Quandary report attached. We will use this one. We updated now to reflect a security fence and sound wall around the compressor(s) ONLY. We're also reaching out to CPW to have them load this report.

Erin Ekblad | Manager of Regulatory Affairs

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

Sent: Friday, November 11, 2016 10:17 AM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Subject: Re: COGCC Form 2A review of Synergy Resources' Orr State 40-36 Pad location - Doc #401102534

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Initial Site Assessment (ISA) ORR - Quandary_160829_11-14-16.pdf
1674K

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

Tue, Nov 15, 2016 at 10:41 AM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Cc: Brandon Lorenz <BLorenz@SYRGINFO.COM>

Erin,

Just a reminder that I'm still waiting to hear from you concerning my Comment #2 and #4. I will be out of the office all of next week, so if we can get this addressed this week I can hopefully avoid finishing up this 2A review in early December. Thanks.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Tue, Nov 15, 2016 at 12:33 PM

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

Good afternoon Doug

Thank you for the heads up that you will be out of the office next week. I will try not to email you while you are out enjoying time off and Thanksgiving!

Ok, I received the plats revised the way we needed them to look.

2) In the Cultural Setback Distance section you have indicated the distance from the nearest production facility to a Building and Building Unit is 1,902 feet and 1,736 feet, respectively. During my review it appears those distances are reversed as the nearest Building Unit is further away than the nearest Building from a production facility. Please confirm these two cultural distances and if need be I can switch them for you.

Yes these got switched, and we have them corrected in drawing attached.

4) In the Water Resources section you have indicated the nearest water well (Permit #280592) is 84 feet away. At this distance it should appear on your Location Drawing, but no water wells are depicted. Was this water identified in the field as being 84 feet away? If yes, please revise the Location Drawing to depict it. If it is not located 84 feet away, please provide me with a revised distance to the nearest well.

The Water well is included in drawing attached and it looks like Baseline found it to be 415 feet on page two of location drawing.

I also included an exhibit that our Weld County representative Troy Swain requested, which I am providing to him today to show we are not in flood plain.

Happy Thanksgiving!

Erin Ekblad | Manager of Regulatory Affairs

Synergy Resources Corporation

1625 Broadway; Suite 500

Denver, CO 80202

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

Sent: Tuesday, November 15, 2016 10:41 AM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Cc: Brandon Lorenz <BLorenz@SYRGINFO.COM>

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2 attachments



ORR STATE 40-36 LOCATION DRAWING.PDF

233K



SYN06N66W31-01 (ORR WELLS)-FLOOD PLAIN.PDF

498K

Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Tue, Nov 15, 2016 at 12:47 PM

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

Sorry for number 2- that 415 distance was from reference well. ☺ I meant to note that.

Erin Ekblad | Manager of Regulatory Affairs

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From: Erin Ekblad

Sent: Tuesday, November 15, 2016 12:34 PM

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

Subject: RE: COGCC Form 2A review of Synergy Resources' Orr State 40-36 Pad location - Doc #401102534

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

Sent: Tuesday, November 15, 2016 10:41 AM

To: Erin Ekblad <EEKBLAD@SYRGINFO.COM>

Cc: Brandon Lorenz <BLorenz@SYRGINFO.COM>

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