



STATE OF  
COLORADO

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

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## COGCC Form 2A review of Extraction's McGirr 26-L location - Doc #401087152

4 messages

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

Thu, Apr 27, 2017 at 10:53 AM

To: Alyssa Andrews <aandrews@extractionog.com>

Cc: Erin Mathews <emathews@extractionog.com>, "Garrison - DNR, Penny" <penny.garrison@state.co.us>

Alyssa,

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

- 1) In the Water Resources section you have indicated the nearest downgradient surface water feature is 1 foot from the edge of the disturbance area. Due to the very close proximity of irrigation ditches, a mapped wetland, and an intermittent creek I would like to change this section of the 2A to indicate YES, this is a Sensitive Area.
- 2) You have provided a Noise Mitigation BMP that indicates "*Sound walls and/or hay bales will be used during drilling and completion operations where necessary.*" This is too ambiguous given that there is a Building Unit to the southeast within the Buffer Zone. Please revise this BMP to include more specifically where the sound walls and/or hay bales will be placed. Additionally, you have proposed gas compressors on this Oil & Gas Location and they are typically sources of on-going long term noise concerns. Therefore, please also include discussion in the revised BMP of what noise mitigation measures will be used for them.
- 3) Due to the proximity of the nearby downgradient mapped wetland and intermittent creek immediately adjacent to the northwest, please provide an additional Storm Water/Erosion Control BMP that addresses how Extraction will prevent and/or control stormwater and erosional runoff from impacting that wetland and intermittent creek.
- 4) Please provide the required 604.c.(2)G - Berm Construction BMP that addresses the construction of containment around the storage tanks with special attention given to the nearby mapped wetland and intermittent creek.
- 5) A review of your Location Drawing depicts a large area in the southern half of the disturbed area. This looks like it could be an area where an MLVT could be staged. You have not indicated that MLVTs will be used for completing the wells. As there have been instances at other locations where Extraction has utilized MLVTs without indicating so on the Form 2A, please confirm Extraction's intention for the storage of water to be used for well completion activities. If an MLVT will be used, we would prefer to include it in the Form 2A now instead of Sundrying the location later.
- 6) Now that the Public Comment period has ended, please send me a letter certifying Extraction's compliance with COGCC Rule 306.e. If any meetings/consultations were held, please also include their outcome.

Please respond to this correspondence by May 27, 2017. If you have any questions, please contact me. Thank you.

*Doug Andrews*

## Oil &amp; Gas Location Assessment Specialist - Northeast Colorado



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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**Alyssa Andrews** <[aandrews@extractionog.com](mailto:aandrews@extractionog.com)>

Thu, Apr 27, 2017 at 10:56 AM

To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

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Thanks Doug. I will review these and get back to you shortly!

**Alyssa Andrews**

*Regulatory Analyst*



Direct: (720) 481-2379

Cell: (425) 652-2811

[aandrews@ExtractionOG.com](mailto:aandrews@ExtractionOG.com)

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**Sent:** Thursday, April 27, 2017 10:54 AM

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**Subject:** COGCC Form 2A review of Extraction's McGirr 26-L location - Doc #401087152

[Quoted text hidden]

**Alyssa Andrews** <aandrews@extractionog.com>

Thu, Apr 27, 2017 at 1:44 PM

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

Cc: Erin Mathews <emathews@extractionog.com>, "Garrison - DNR, Penny" <penny.garrison@state.co.us>

Hi Doug,

Please see my responses below. Let me know if you have more questions.

Thanks,

**Alyssa Andrews**

*Regulatory Analyst*



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2) You have provided a Noise Mitigation BMP that indicates "*Sound walls and/or hay bales will be used during drilling and completion operations where necessary.*" This is too ambiguous given that there is a Building Unit to the southeast within the Buffer Zone. Please revise this BMP to include more specifically where the sound walls and/or hay bales will be placed. Additionally, you have proposed gas compressors on this Oil & Gas Location and they are typically sources of on-going long term noise concerns. Therefore, please also include discussion in the revised BMP of what noise mitigation measures will be used for them.

**Sound walls will be used on the east and south-east sides of the location during drilling and completion operations.**

**If needed, sound mitigation panels will be installed around the compressors during production operations to shield sensitive areas.**

3) Due to the proximity of the nearby downgradient mapped wetland and intermittent creek immediately adjacent to the northwest, please provide an additional Storm Water/Erosion Control BMP that addresses how Extraction will prevent and/or control stormwater and erosional runoff from impacting that wetland and intermittent creek.

**Along the northwest side of the pad, a sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practice and per specifications provided within Extraction's Stormwater and Erosion Control BMP manual.**

**A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap.**

**If necessary check dams will be constructed within the swale.**

4) Please provide the required 604.c.(2)G - Berm Construction BMP that addresses the construction of containment around the storage tanks with special attention given to the nearby mapped wetland and intermittent creek.

604.c.(2).G. Berm construction. Tank berms shall be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. All berms will be visually checked weekly at a minimum to a maximum of daily to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel.

5) A review of your Location Drawing depicts a large area in the southern half of the disturbed area. This looks like it could be an area where an MLVT could be staged. You have not indicated that MLVTs will be used for completing the wells. As there have been instances at other locations where Extraction has utilized MLVTs without indicating so on the Form 2A, please confirm Extraction's intention for the storage of water to be used for well completion activities. If an MLVT will be used, we would prefer to include it in the Form 2A now instead of Sundrying the location later.

We will not have MLVTs on this location. That area will be used for topsoil and stockpile. We are planning to have the MLVTs on a separate location.

6) Now that the Public Comment period has ended, please send me a letter certifying Extraction's compliance with COGCC Rule 306.e. If any meetings/consultations were held, please also include their outcome.

Please see the attached certification letter. No consultations were requested.

Please respond to this correspondence by May 27, 2017. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



1120 Lincoln St., Suite 801

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 **McGirr 306 e Certification Letter to The Director.pdf**  
86K

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Thu, Apr 27, 2017 at 1:58 PM

Hi Doug,

I added another sentence to #3 and the sediment trap will actually be on the northeast side (not the northwest). Here is the full revision below:

Along the **northeast** side of the pad, a sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practice and per specifications provided within Extraction's Stormwater and Erosion Control BMP manual.

A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap.

If deemed necessary at the onsite pre-construction meeting, sediment barriers, such as silt fencing, will be installed along the northwest and northeast sides of the pad.

If necessary check dams will be constructed within the swale.

Thanks,

**Alyssa Andrews**

*Regulatory Analyst*



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