



STATE OF COLORADO

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

COGCC Form 2A review of Captiva Energy Partners' Stillroven Farm Pad location - Doc #401312378

4 messages

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

Mon, Jul 31, 2017 at 1:31 PM

Kaitlyn,

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

- 1) The Location Drawing and Facility Layout Drawing depict a sales meter on this Oil & Gas Location. However, it is not listed in the Other Facilities section. Therefore, I would like to add this piece of equipment to that section of the Form 2A.
- 2) In the Drilling Waste Management Program section of the Form 2A you have indicated that drilling fluids and cuttings will be disposed of via UIC Disposal and a Centralized E&P WMP, respectively. However, the Waste Management Plan indicates drill cuttings and drilling fluids will be reused by land spreading on a COGCC approved mud farm or disposed of at a licensed Commercial Disposal facility. Please confirm the method of disposal for the both the drilling fluids and drill cuttings for these wells.
- 3) In the Cultural Setback Distance section you have indicated the nearest High Occupancy Building Unit is greater than a mile from both the nearest well and production facility. During my review I identified a child care facility (Country Kids Preschool) located approximately 4,785 feet south-southeast of the nearest well and 4,900 feet south-southeast of the nearest production facility. Child care facilities are considered High Occupancy Building Units. Therefore, I would like to revise these two cultural distances on the Form 2A.
- 4) The Traffic Control BMP indicates "*If required by the local government, a traffic plan shall be coordinated with the local jurisdiction...*" It also indicates "*Captiva Energy Partners is in contact with the Town of Mead regarding traffic...*" This Oil & Gas Location is located in unincorporated Weld County and will be accessed directly off of Weld County Road 5 per the Access Road Map. Please revise this BMP to indicate whether Weld County requires a traffic plan for this Oil & Gas Location.
- 5) The Leak Detection BMP indicates a "*Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.*" Please revise this BMP to indicate what the pumper will be instructed to do if a leak is discovered during the inspection.
- 6) The Lighting impact BMP indicates "*Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.*" However, it then goes on to indicate "*Lighting shall be mounted at compressor stations on a pole or building...*" These two statements seem contradictory. Please clarify this BMP.
- 7) Because this Oil & Gas Location is within a Buffer Zone, the following additional mitigation measure BMPs are required:
 - 604.c.(2)B - Closed Loop Drilling
 - 604.c.(2)K - Pit level indicators
 - 604.c.(2)O - Loadlines
 - 604.c.(2)T - Well site cleared
 - 604.c.(2)U - Identification of plugged and abandoned wells
 - 604.c.(2)V - Development form existing well pads

8) Now that the Public Comment period has ended, please send me a letter certifying the Captiva Energy Partners has complied with Rule 306.e. If any meetings and/or consultation were held, please also

indicate their outcome.

Please respond to this correspondence By August 31, 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
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

Kaitlyn Cook <kcook@progressivepcs.net>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Julie Webb <jwebb@progressivepcs.net>, Paul Onsager <ponsager@gmail.com>

Tue, Aug 8, 2017 at 11:37 AM

Hello Doug,

Please find answers to the following comments below in Green. Please contact me if you have any additional questions.

Thank you!

Kaitlyn Cook

Regulatory Analyst

Progressive Consulting, Inc.

1625 Broadway. Suite 880.

Denver, CO 80202

Cell [\(719\)248-4254](tel:7192484254)

Office [\(303\)309-1655](tel:3033091655)

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

Sent: Monday, July 31, 2017 1:32 PM

To: Kaitlyn Cook <kcook@progressivepcs.net>

Subject: COGCC Form 2A review of Captiva Energy Partners' Stillroven Farm Pad location - Doc #401312378

Kaitlyn,

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

- 1) The Location Drawing and Facility Layout Drawing depict a sales meter on this Oil & Gas Location. However, it is not listed in the Other Facilities section. Therefore, I would like to add this piece of equipment to that section of the Form 2A. **Yes, Please add this to the "other" facility section.**

- 2) In the Drilling Waste Management Program section of the Form 2A you have indicated that drilling fluids and cuttings will be disposed of via UIC Disposal and a Centralized E&P WMP, respectively. However, the Waste Management Plan indicates drill cuttings and drilling fluids will be reused by land spreading on a COGCC approved mud farm or disposed of at a licensed Commercial Disposal facility. Please confirm the method of disposal for the both the drilling fluids and drill cuttings for these wells. **This was listed incorrectly. It should have been Commercial Disposal.**

- 3) In the Cultural Setback Distance section you have indicated the nearest High Occupancy Building Unit is greater than a mile from both the nearest well and production facility. During my review I identified a child care facility (Country Kids Preschool) located approximately 4,785 feet south-southeast of the nearest well and 4,900 feet south-southeast of the nearest production facility. Child care facilities are considered High Occupancy Building Units. Therefore, I would like to revise these two cultural distances on the Form 2A. **It appears that COGCC is correct. The Cultural Items Map has been updated with the corrected setbacks from a high Occupancy Building Unit. Please find attached.**

- 4) The Traffic Control BMP indicates "*If required by the local government, a traffic plan shall be coordinated with the local jurisdiction...*" It also indicates "*Captiva Energy Partners is in contact with the Town of Mead regarding traffic...*" This Oil & Gas Location is located in unincorporated Weld County and will be accessed directly off of Weld County Road 5 per the Access Road Map. Please revise this BMP to indicate whether Weld County requires a traffic plan for this Oil & Gas Location. **I talked to Janet Ludquest at the Weld County office about a traffic plan, she said Captiva will just need a traffic Narrative which we are working on now. Please see attached revised BMP.**

- 5) The Leak Detection BMP indicates a "*Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.*" Please revise this BMP to indicate what the pumper will be instructed to do if a leak is discovered during the inspection. **Please see revised BMP attached.**

- 6) The Lighting impact BMP indicates "*Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.*" However, it then goes on to indicate "*Lighting shall be mounted at compressor stations on a pole or building...*" These two statements seem contradictory. Please clarify this BMP. **Please see revised BMP attached.**

- 7) Because this Oil & Gas Location is within a Buffer Zone, the following additional mitigation measure BMPs are required: **Please see revised BMP attached.**

604.c.(2)B - Closed Loop Drilling

604.c.(2)K - Pit level indicators

604.c.(2)O - Loadlines

604.c.(2)T - Well site cleared

604.c.(2)U - Identification of plugged and abandoned wells

604.c.(2)V - Development form existing well pads

8) Now that the Public Comment period has ended, please send me a letter certifying the Captiva Energy Partners has complied with Rule 306.e. If any meetings and/or consultation were held, please also indicate their outcome. Please find attached an updated letter showing clarification that Captiva has complied with Rule 306.e. If more details are needed please give me a call to discuss.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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3 attachments

 **Revised Stillroven Farm BMPs_08-01-17.docx**
16K

 **CULTURAL MAP_STILLROVEN FARM (2017-08-01).pdf**
242K

 **Sillroven Farm Pad COGCC Rule 306.e. Certification_with_Edits (002).pdf**
539K

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

Tue, Aug 8, 2017 at 2:46 PM

To: Kaitlyn Cook <kcook@progressivepcs.net>

Cc: Julie Webb <jwebb@progressivepcs.net>, Paul Onsager <ponsager@gmail.com>

Kaitlyn,

The additional BMPs you provided do not include three that I asked for. Please provide the following:

604.c.(2)B - Closed Loop Drilling

604.c.(2)O - Loadlines

604.c.(2)T - Well site cleared

Also the 306.e. Certification letter indicates Building Unit owner David Schwind contacted Captiva with questions concerning the Oil and Gas Location and the facilities. Please provide more information as to what his questions/concerns were and what Captiva's responses were.

Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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[Quoted text hidden]

Julie Webb <jwebb@progressivepcs.net>

Tue, Aug 8, 2017 at 3:13 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Kaitlyn Cook <kcook@progressivepcs.net>

Cc: Paul Onsager <ponsager@gmail.com>

Doug,

I'm sorry we missed the three BMPs, please find them below.

604.c.(2)B - Closed Loop Drilling: Drilling/Completion Operations 604.c.(2)B.i Operator will be utilizing a closed loop system.

604.c.(2)O – Loadlines: 604.c.(2).O. Drilling and Completion-All loadlines shall be bullplugged or capped.

604.c.(2)T - Well site cleared: 604.c.(2)T. Within 90 days subsequent to the time of plugging and abandonment of the entire site, superfluous debris and equipment shall be removed from the site. Identification of plugged and abandoned wells will be identified pursuant to 319.a.(5).

Mr. Schwind's attorney asked if we could move the location to the NW quarter of section 5. We explained that Mr. Stillroven chose the location and that we preferred to drill the wells up-dip from east to west, so the location was ideally suited from a geologic standpoint. Mr. Kenny then said that he would talk to Stillroven Farm about the possibly moving the location the NW of Section 5.

Please let me know if you have any additional questions.

Thank you,

Julie Webb
Senior Regulatory Analyst
Progressive Consulting
[616-813-5063](tel:616-813-5063)

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Tuesday, August 8, 2017 2:46 PM
To: Kaitlyn Cook
Cc: Julie Webb; Paul Onsager
Subject: Re: COGCC Form 2A review of Captiva Energy Partners' Stillroven Farm Pad location - Doc #401312378

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