

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, August 29, 2017 12:06 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** Catamount Energy Partners LLC, IGW N33N8W 6SESW Pad, SESW Sec 6 T33N R8W, La Plata County, Form 2A #401317831 Review

**Categories:** Operator Correspondence

Scan No. 2108199      CORRESPONDENCE      2A #401317831

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**From:** Nolan Redmond [mailto:[nredmond@catamountep.com](mailto:nredmond@catamountep.com)]  
**Sent:** Friday, August 25, 2017 4:53 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: Catamount Energy Partners LLC, IGW N33N8W 6SESW Pad, SESW Sec 6 T33N R8W, La Plata County, Form 2A #401317831 Review

Hey Dave,

We don't have any issues with these COAs or the wildlife BMP being added to the 2A. Let me know if you need anything else from us.

Thanks,

Nolan Redmond  
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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, August 10, 2017 2:02 PM  
**To:** Nolan Redmond <[nredmond@catamountep.com](mailto:nredmond@catamountep.com)>  
**Subject:** Catamount Energy Partners LLC, IGW N33N8W 6SESW Pad, SESW Sec 6 T33N R8W, La Plata County, Form 2A #401317831 Review  
**Importance:** High

Nolan,

I have been reviewing the IGW N33N8W 6SESW Pad **Form 2A#401317831**. Based on COGCC's review, the following updates, revisions, and corrections have been made to the Form 2A:

Based on COGCC's review of COGCC's Topo Map layer and Construction Layout Drawings attachment (and discussions with the operator on 08-10-17), COGCC has revised the Ground Elevation from 6752' to 6450' and the Eastimated post-construction ground elevation from 6752' to 6456' (current well pad elevation);

Based on proximity of the well pad to downgradient surface water (intermittent stream located 87' to the north based on COGCC's review of COGCC's 2015 Aerial Photo Layer, Topo Map layer, and Hydrology Map attachment), COGCC has revised the distance to nearest downgradient surface water from 330' to 87' and this location has been designated a "sensitive area".

COGCC would like to attach the following conditions of approval (COAs) based on the information and data Catamount has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following condition of approval (COA) will apply:

**COA 91** - In addition to the notifications required by COGCC listed in **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to pipeline testing (flowlines from wellheads to separators to tanks) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

**Construction:** The following conditions of approval (COAs) will apply:

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations.

**COA 24** - Based on the recent onsite (07-27-17) conducted by COGCC, CPW, and the operator, additional stormwater controls will be required for the existing well pad area of this oil and gas location.

**COA 44** - The access road will be maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

**COA 76** - Strategically apply fugitive dust control measures to reduce fugitive dust and coating of vegetation and deposition in water sources.

**COA 58** - Berms or other containment devices constructed around permanent produced water storage tanks shall be sufficiently impervious to contain any spilled or released material.

**Drilling/Completions Operations:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of any cuttings in a cuttings trench or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

**COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply:

**COA 45** - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance.

**CPW Wildlife Consultation/Comment:** The following comment was placed on the Form 2A by CPW on 08-09-17:

*"CPW, COGCC, and Catamount conducted an onsite of the proposed location on 7/27/2017. The proposed well is located on an existing pad with no proposed additional surface disturbances. Catamount indicated that they would not be drilling in the winter and that they wanted to drill this well as soon as possible.*

*CPW recommends that if the operator elects to wait to drill this location after December 15, 2018, then the operator should conduct a pre-construction raptor nest survey as outlined on the Wildlife BMP tab.*

***This survey is needed as suitable nesting sites for raptors existing within a 1/2 mile of the proposed location. If a new raptor nest is found during the survey CPW recommends that the operator follow CPWs Raptor Nest Buffer Guidelines to avoid disturbing nesting raptors."***

***CPW recommends that the following measure be added as BMP or COA to avoid and minimize impacts to wildlife from the proposed development:***

***BMP 1 - If new oil and gas operations must occur between December 15 and July 31, operator will conduct a pre-construction raptor nest survey to determine the presence/absence of active bald or golden eagle nests within 0.5 miles of the well location. If an active nest is identified, operator will preclude new oil and gas operations from December 15 to July 31 annually. This does not apply to existing production operations.***

Although Catamount has received and included a Surface Owner Waiver indicating that they will not agree to any wildlife BMPs; COGCC has reviewed the CPW recommended wildlife BMP and has determined that this BMP could be adopted by the operator since there is an active golden eagle nest approximately 4500' to the north; and there should not be any impact to the surface owners.

COGCC would appreciate your concurrence with attaching the COGCC COAs and the one CPW BMP to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG  
Oil and Gas Location Assessment Specialist  
Western Colorado



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