



STATE OF
COLORADO

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

COGCC Form 2A review of SRC Energy's Troutd 18-27 Pad location - Doc #401368318

3 messages

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

Wed, Nov 8, 2017 at 11:05 AM

Erin,

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

1) In the Facilities section SRC Energy has indicated there will be three gas lift skids on this proposed Oil & Gas Location. However, the Facility Layout Drawing does not depict where these three gas lift skids will be placed. If SRC Energy does intend to have gas lift skids, please revise the Facility Layout Drawing to show where they will be placed.

2) In the Construction section SRC Energy has indicated that construction will commence on 1/26/18 and interim reclamation will begin on 1/31/20. This is more that two years after construction starts and does not comply Rule 1003.b. Does SRC Energy plan to stagger the drilling of these 36 wells? Please provide either a revised date interim reclamation will begin or additional information as to how SRC Energy will comply with Rule 1003.b. at this proposed Oil & Gas Location.

3) In the Water Resources section SRC Energy has indicated the distance to the nearest downgradient surface water feature is 101 feet. The basis for this is that the closer irrigation ditches were dry at the time of the survey so a nearby pond was used. Visible water in a surface water feature does not need to be present the day the location was surveyed for it to be considered the nearest downgradient surface water feature. Irrigation ditches, intermittent and ephemeral streams, and wetland areas frequently do not have water in them continuously. They are still considered surface water features. If water is present in one of these surface water features at any time of the year, they should be considered when answering this question. It is quite likely that the nearby irrigation ditches will have water in them during every growing season. Therefore, it seems the irrigation ditch that bisects the northern 24 wells from the production facilities and southern 12 wells is the nearest downgradient surface water. Per the Hydrology Map, this irrigation ditch is 21 feet away. Therefore, I would like to change this distance on the Form 2A from 101 feet to 21 feet.

4) In the Water Resources section SRC Energy has included a statement indicating the nearest water well is 59 feet away. This appears to be a monitoring well that is not indicated on any of the attachments as being field verified this close to the location. Apparently it was permitted this close to the location but was either never drilled or has been subsequently removed. Additionally, the listed distance to the nearest water well in the Water Resources section of 781 feet appears to be based on a field verified water well. Therefore, I would like to revise the statement about the nearest water well.

5) SRC Energy has provided the required 604.c.(2)N - Control of fire hazards BMP. Please revise this BMP to also include the requirement of COGCC Rule 606A.d. which concerns the setback for flammable liquids from wellbores.

6) Now that the Public Comment period has ended, please provide me with a letter certifying SRC Energy's compliance with Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Please respond to this correspondence by December 8, 2017. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



303.894.2100 Ext. 5180

1120 Lincoln St., Suite 801, Denver, CO 80203

doug.andrews@state.co.us | <http://cogcc.state.co.us/>

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

Mon, Nov 13, 2017 at 1:01 PM

Doug

See below for answers and attached new facility layout drawing depicting gas lift skids.

1) In the Facilities section SRC Energy has indicated there will be three gas lift skids on this proposed Oil & Gas Location. However, the Facility Layout Drawing does not depict where these three gas lift skids will be placed. If SRC Energy does intend to have gas lift skids, please revise the Facility Layout Drawing to show where they will be placed. **See attached.**

2) In the Construction section SRC Energy has indicated that construction will commence on 1/26/18 and interim reclamation will begin on 1/31/20. This is more that two years after construction starts and does not comply Rule 1003.b. Does SRC Energy plan to stagger the drilling of these 36 wells? Please provide either a revised date interim reclamation will begin or additional information as to how SRC Energy will comply with Rule 1003.b. at this proposed Oil & Gas Location. **Interim reclamation is changed to 01.31.19**

3) In the Water Resources section SRC Energy has indicated the distance to the nearest downgradient surface water feature is 101 feet. The basis for this is that the closer irrigation ditches were dry at the time of the survey so a nearby pond was used. Visible water in a surface water feature does not need to be present the day the location was surveyed for it to be considered the nearest downgradient surface water feature. Irrigation ditches, intermittent and ephemeral streams, and wetland areas frequently do not have water in them continuously. They are still considered surface water features. If water is present in one of these surface water features at any time of the year, they should be considered when answering this question. It is quite likely that the nearby irrigation ditches will have water in them during every growing season. Therefore, it seems the irrigation ditch that bisects the northern 24 wells from the production facilities and southern 12 wells is the nearest downgradient surface water. Per the Hydrology Map, this irrigation ditch is 21 feet away. Therefore, I would like to change this distance on the Form 2A from 101 feet to 21 feet. **Yes this is fine to be changed.**

4) In the Water Resources section SRC Energy has included a statement indicating the nearest water well is 59 feet away. This appears to be a monitoring well that is not indicated on any of the attachments as being field verified this close to the location. Apparently it was permitted this close to the location but was either never drilled or has been subsequently removed. Additionally, the listed distance to the nearest water well in the Water Resources section of 781 feet appears to be based on a field verified water well. Therefore, I would like to revise the statement about the nearest water well. **This is fine. I went with the 59 feet one initially because it was the closest. However 781 feet to other water well is perfectly fine with me to change.**

5) SRC Energy has provided the required 604.c.(2)N - Control of fire hazards BMP. Please revise this BMP to also include the requirement of COGCC Rule 606A.d. which concerns the setback for flammable liquids from wellbores. **Please add following this the BMP:**

Per 604A.d. Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, equivalent safety measures should be taken.

6) Now that the Public Comment period has ended, please provide me with a letter certifying SRC Energy's compliance with Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

I am working on this one now, and will send before end of day today.



Erin Ekblad

Manager of Regulatory Affairs

1675 Broadway, Suite 2600; Denver, CO 80202

Cell: 303.550.2375 | Office: 720.616.4319 | E-mail: EEKblad@srcenergy.com

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Wednesday, November 08, 2017 11:06 AM
To: Erin Ekblad <EEKblad@srcenergy.com>
Subject: COGCC Form 2A review of SRC Energy's Troutd 18-27 Pad location - Doc #401368318

[Quoted text hidden]

This message, including any attachments, is intended only for the use of the individual(s) to which it is addressed and may contain information that may be privileged/confidential and protected from disclosure. Any other distribution, copying or disclosure is strictly prohibited. If you are not the intended recipient or have received this message in error, please notify us immediately by reply e-mail and permanently delete this message including any attachments, without reading it or making a copy. Thank you.

 **Troutd 18-27 6N66W27 Facility Location Drawing.pdf**
1072K

Erin Ekblad <EEKblad@srcenergy.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Brian DeRose <bderose@srcenergy.com>

Mon, Nov 13, 2017 at 1:49 PM

Doug

See attached for the remaining item you had requested for Troutd 18-27 Pad, for the 306.e. certification letter. We did not receive any requests for meetings or consultations with BU's for this proposed pad.

You should now have everything you need for this pad.



Erin Ekblad

Manager of Regulatory Affairs

1675 Broadway, Suite 2600; Denver, CO 80202

Cell: 303.550.2375 | Office: 720.616.4319 | E-mail: EEKBLAD@SRCENERGY.COM

From: Erin Ekblad

Sent: Monday, November 13, 2017 1:01 PM

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

Subject: RE: COGCC Form 2A review of SRC Energy's Troutd 18-27 Pad location - Doc #401368318

[Quoted text hidden]

 **306 e Certification Letter to The Director Troutd 18-27 Pad.pdf**
254K