

STATE OF
COLORADO

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

RE: Pierce DE 26-054 2A

4 messages

Geoff Lee <glee@gwogco.com>

Fri, Oct 20, 2017 at 10:26 AM

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

Cc: "Trask - DNR, Sabrina" <sabrina.trask@state.co.us>, Miracle Pfister <mpfister@gwogco.com>

Doug,

I spoke to our facilities manager and he corrected my line numbers and described their location as you requested.

1 - 2" steel Flowline: Wellhead to Separator

1 – 3" steel Oil line: Separator to Tanks

1 – 3" poly Water line: Separator to Tanks

1 – 4" Steel Gas line: Separator to Meter

Can we get this information changed on the 2A I submitted yesterday. Please let me know if there is anything I need to do.

Thanks for all the help,

Geoff

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]**Sent:** Thursday, October 19, 2017 3:24 PM**To:** Geoff Lee <glee@gwogco.com>**Cc:** Trask - DNR, Sabrina <sabrina.trask@state.co.us>**Subject:** Re: Pierce DE 26-054 2A

Geoff,

The pipeline description should break out all lines from the wellhead to the separator, from the separator to the tanks, from the tanks to the meter and LACT, etc. Right now you indicate there will be 1 flowline, 5 oil lines, 1 water line, 5 gas lines, & 1 gas line. Seems like a lot of lines for a single well pad. We'd like to know where the run to/from.

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/>

On Thu, Oct 19, 2017 at 2:50 PM, Geoff Lee <glee@gwogco.com> wrote:

Thank you both for your help. I have made the changes as requested and will be submitting the permits here shortly.

Doug,

I have never encountered the location of the lines on the pad question before and if required will get those to you later in the permitting process. Is this a new requirement?

Again thank you both very much for your help and I hope this process make all our lives easier,



Geoff Lee

Regulatory Analyst

Great Western Operating Company, LLC

1801 Broadway, Suite 500

Denver, CO 80202

Direct: [303-398-0355](tel:303-398-0355)

Cell: [303-882-0132](tel:303-882-0132)

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

Sent: Thursday, October 19, 2017 1:45 PM

To: Trask - DNR, Sabrina <sabrina.trask@state.co.us>
Cc: Geoff Lee <glee@gwogco.com>
Subject: Re: Pierce DE 26-054 2A

Geoff,

Some things to correct/add:

- * You list descriptions for several pipelines. Can you also include where these lines go to and from (e.g. wellhead to separator, etc.)
- * You have selected Water Well sampling Rule 318A in the Water Resources section. That is the applicable Rule for pads located in the GWA. Township 8N is outside the GWA, so the water well sampling Rule would be 609
- * Many of the BMPs you have provided are listed as being from Rule 604.c.(2) This location is not in a Buffer Zone so an operator is not required to provide the 604.c.(2) BMPs. If Noble still wishes to include these BMPs, we'd like to see the specific Rule 604.c.(2) citation removed from the BMP title. For example, change the "*Traffic Plan - Rule 604.c.(2)D*" BMP to just be listed as "*Traffic Plan*" without the Rule number citation. We have had folks in the public see this on Form 2As and get confused thinking the location should be marked as being in a Buffer Zone.

Thanks.

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/>

On Thu, Oct 19, 2017 at 12:41 PM, Trask - DNR, Sabrina <sabrina.trask@state.co.us> wrote:

Geoff,

I responded to your earlier email with some necessary corrections for the Form 2.

Thanks,

Sabrina

On Thu, Oct 19, 2017 at 11:22 AM, Geoff Lee <glee@gwogco.com> wrote:

Doug,

We are in the process of permitting a well that the Powers that be at Great Western asap. I have completed the permits and I was wondering if you will take a look at this 2a for me in draft so I can correct any issues before I submit.

Doc # 401426540

Thank you,



Geoff Lee

Regulatory Analyst

Great Western Operating Company, LLC

1801 Broadway, Suite 500

Denver, CO 80202

Direct: [303-398-0355](tel:303-398-0355)

Cell: [303-882-0132](tel:303-882-0132)

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Sabrina Trask

Permit/Completion Technician



P 303.894.2100 x5125 | F 303.894.2109

1120 Lincoln Street, Suite 801, Denver, CO 80203

sabrina.trask@state.co.us | www.colorado.gov/cogcc

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

Thu, Nov 9, 2017 at 11:17 AM

To: Geoff Lee <glee@gwogco.com>

Cc: "Trask - DNR, Sabrina" <sabrina.trask@state.co.us>, Miracle Pfister <mpfister@gwogco.com>

Geoff,

I have reviewed the Pierce DE 26-054 Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) I have updated the pipeline description as you requested.
- 2) In the Location Identification section Great Western has indicated the quarter-quarter is NESW. This is based on the reference point being the well. However, all of the attachments indicate it is in the SESW quarter-quarter. A closer inspection appears to indicate the well straddles the line between the NESW and SESW quarter-quarter. The Location Identification on the 2A needs to agree with what is shown on the attachments. This requires that either the attachments be revised to indicate the NESW quarter-quarter or the Location Identification on the 2A be changed to SESW. If the attachments are wrong, that means this Form 2A is eligible to be Rejected. I suspect this issue may also be on the Form 2A APD as well but will let Sabrina Trask work with you on resolving that. Please let me know how you wish to proceed.
- 3) In the Facilities section Great Western has indicated there will be one Vapor Recovery Unit but the Facility Layout Drawing indicates there will be one Vapor Recovery Tower (VRT). If indeed Great Western will be using a VRT, I would like to revise the Facilities section to specify that.
- 4) In the Cultural Setback Distance section Great Western has indicated the nearest railroad is more than a mile from both the well and the nearest production facility. During my review I identified a railroad approximately 2,600 feet to the southwest that parallels US Highway 85 through Pierce. Please provide me with updated distance from this railroad to the well and the nearest production facility.
- 5) In the Drilling Program and Drilling Waste Management Program section Great Western has indicated that oil based drilling fluids will be used and that drilling fluids and cuttings will be disposed of offsite at a commercial disposal facility. However, the Waste Management Plan attachment only discusses disposal of water based bentonitic fluids and cuttings. Please provide an updated Waste Management Plan that also discusses handling and disposal of oil based drilling fluids and associated cuttings.

Please respond to this correspondence by December 9, 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/>

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Geoff Lee <glee@gwogco.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: "Trask - DNR, Sabrina" <sabrina.trask@state.co.us>

Thu, Nov 9, 2017 at 2:17 PM

Doug,

Thank you for looking at this pad and bringing these issues to my attention. I have responded to all your requests in blue

- 1) I have updated the pipeline description as you requested.

Thank you for doing this.

2) In the Location Identification section Great Western has indicated the quarter-quarter is NESW. This is based on the reference point being the well. However, all of the attachments indicate it is in the SESW quarter-quarter. A closer inspection appears to indicate the well straddles the line between the NESW and SESW quarter-quarter. The Location Identification on the 2A needs to agree with what is shown on the attachments. This requires that either the attachments be revised to indicate the NESW quarter-quarter or the Location Identification on the 2A be changed to SESW. If the attachments are wrong, that means this Form 2A is eligible to be Rejected. I suspect this issue may also be on the Form 2A APD as well but will let Sabrina Trask work with you on resolving that. Please let me know how you wish to proceed.

The attachments are correct. The indicated QTRQTR should be changed to SESW.

3) In the Facilities section Great Western has indicated there will be one Vapor Recovery Unit but the Facility Layout Drawing indicates there will be one Vapor Recovery Tower (VRT). If indeed Great Western will be using a VRT, I would like to revise the Facilities section to specify that.

We are indeed using a VRT. I was under the impression a VRU was the same as a VRT. I will make note of the difference on future permits.

4) In the Cultural Setback Distance section Great Western has indicated the nearest railroad is more than a mile from both the well and the nearest production facility. During my review I identified a railroad approximately 2,600 feet to the southwest that parallels US Highway 85 through Pierce. Please provide me with updated distance from this railroad to the well and the nearest production facility.

There is indeed a railroad 2600' away from the production equipment and well. Our Survey company must have missed it somehow and we have gotten in contact with them and should have updated distances ASAP which I will send to you immediately.

5) In the Drilling Program and Drilling Waste Management Program section Great Western has indicated that oil based drilling fluids will be used and that drilling fluids and cuttings will be disposed of offsite at a commercial disposal facility. However, the Waste Management Plan attachment only discusses disposal of water based bentonitic fluids and cuttings. Please provide an updated Waste Management Plan that also discusses handling and disposal of oil based drilling fluids and associated cuttings.

I apologize for this issue. I have attached the new waste management plan to this email which covers oil based drilling fluids and associated cuttings.

Thank you for the help as I learn. Please let me know if there is anything you need from me in the future,



Geoff Lee

Regulatory Analyst

Great Western Operating Company, LLC

1801 Broadway, Suite 500

Denver, CO 80202

Direct: [303-398-0355](tel:303-398-0355)

Cell: [303-882-0132](tel:303-882-0132)

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

Sent: Thursday, November 9, 2017 11:18 AM

To: Geoff Lee <glee@gwogco.com>

Cc: Trask - DNR, Sabrina <sabrina.trask@state.co.us>; Miracle Pfister <mpfister@gwogco.com>

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 **Waste_Management_Plan_110917.pdf**
63K

Geoff Lee <glee@gwogco.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Nov 13, 2017 at 2:58 PM

Doug,

The survey company has gotten back to me on the updated Railroad numbers. The distances to the railroad are 73° southwest 2,571' from our wellhead and 73° southwest 2,466' from our equipment (from compressor). Do I need to include these on any drawings?

Thanks for working with me and let me know if you need any additional information,



Geoff Lee

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

Sent: Thursday, November 9, 2017 11:18 AM

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