



December 4, 2017

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80202

**RE: Request to Flare**  
Extraction Oil & Gas, Inc.  
MLD 2; API #05-123-44812  
MLD 3; API #05-123-44813  
MLD 4; API #05-123-44815  
MLD 5; API #05-123-44821  
MLD 7; API #05-123-44822  
MLD 8; API #05-123-44818  
MLD 9; API #05-123-44810  
MLD 10; API #05-123-44817  
MLD 11; API #05-123-44816

Dear Ms. Burn,

Extraction Oil & Gas, Inc. (Extraction) hereby requests temporary authorization to flare per rule 912 as required by the Commission regarding the following Extraction sites:

<i>Site Name</i>	<i>API NO</i>	<i>Field</i>
MLD 2	#05-123-44812	Wattenberg
MLD 3	#05-123-44813	Wattenberg
MLD 4	#05-123-44815	Wattenberg
MLD 5	#05-123-44821	Wattenberg
MLD 7	#05-123-44822	Wattenberg
MLD 8	#05-123-44818	Wattenberg
MLD 9	#05-123-44810	Wattenberg
MLD 10	#05-123-44817	Wattenberg
MLD 11	#05-123-44816	Wattenberg

**Rule 912 provides that:**

- a. The unnecessary or excessive venting or flaring of natural gas produced from a well is prohibited.

- b. Except for gas flared or vented during an upset condition, well maintenance, well stimulation flowback, purging operations, or a productivity test, gas from a well shall be flared or vented only after notice has been given and approval obtained from the Director on a Sundry Notice, Form 4, stating the estimated volume and content of the gas. The notice shall indicate whether the gas contains more than one (1) ppm of hydrogen sulfide. If necessary to protect the public health, safety or welfare, the Director may require the flaring of gas.
- c. Gas flared, vented or used on the lease shall be estimated based on a gas-oil ratio test or other equivalent test approved by the Director, and reported on Operator's Monthly Report of Operations, Form 7.
- d. Flared gas that is subject to Sundry Notice, Form 4, shall be directed to a controlled flare in accordance with Rule 903.b.(2) or other combustion device operated as efficiently as possible to provide maximum reduction of air contaminants where practicable and without endangering the safety of the well site personnel and the public.
- e. Operators shall notify the local emergency dispatch or the local governmental designee of any natural gas flaring. Notice shall be given prior to flaring when flaring can be reasonably anticipated, or as soon as possible, but in no event more than two (2) hours after the flaring occurs.

2 C.C.R. 1-404:912 (2015).

### **Commission Requests**

Based on the draft Notice to Operators dated November 4, 2015, the Commission requests for such authorization include:

- 1) The estimated volume and content of the gas to be flared.
- 2) Hydrogen sulfide gas analysis for the subject well.
- 3) For requests based on lack of available infrastructure, the operator must state:
  - a. Why the well cannot be connected to midstream infrastructure (e.g., remote area with no plans to constructed infrastructure) and an economic justification for this determination.
  - b. When the well(s) will be connected to midstream infrastructure, and why the operator commenced production of the well before midstream infrastructure was available.
- 4) A statement that the operator will comply with rule 805.b.(1).; and,
- 5) A statement that the operator will use an enclosed flare unless an open flare is specifically allowed by CDPHE's Regulation 7, and that any site specific permitting required by CDPHE is complete.

**Extraction's Request**

Extraction is planning to begin the flowback process in early December of 2017 and hereby requests authorization to flare temporarily for no more than 45 days at this location by providing information to the Commission's request by submitting a Form 4 Sundry request with this attachment.

Answers to the questions listed above are as follows:

- 1) The estimated volume for this temporary period is 5 mmcfpd.
- 2) Hydrogen sulfide is not anticipated. Extraction will have a sample collected and rush analyzed for this analysis and will provide the results to the Commission as soon as received.
- 3) This request is based on midstream infrastructure constraints and contract changes. Extraction had originally planned on contracting with DCP Midstream and has been requested recently to constrain existing and new gas volumes to their system. Extraction immediately contacted Anadarko Midstream for an analysis for gathering this location and began right-of-way negotiations. We anticipate that the tie in to the Anadarko system to take place in early to mid-January.
- 4) The operator is intending to flare the associated gas and therefore will comply with the odor provisions of Rule 805.b.(1).
- 5) Extraction intends to use an enclosed flare for encountered gas from the wellhead and ECD's for compliance with storage tank emissions management. All other permitting and compliance provisions for the CDPHE are in process and will be followed as required.

Please contact Josh Carlisle at (720) 481-2372 if you need further information.

Sincerely,



Josh Carlisle  
Environmental, Health, Safety and Regulatory Manager  
Extraction Oil & Gas, Inc.