

STATE OF
COLORADO

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

COGCC Form 2A review of SRC Energy's Bluff Federal State 40-1 Pad location - Doc #401452969

7 messages

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

Tue, Dec 5, 2017 at 2:45 PM

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 provide a rather large pipeline description listing what seems like a lot of pipelines for a well only pad. Are all of the pipelines described on the Form 2A going to be in place on this location?
- 2) In the Construction section SEC Energy has indicated that interim reclamation will begin on 6/19/19. This more than a year after construction is planned to commence. This seems like a rather long time for the disturbed area to remain unreclaimed. Is it going to take SRC Energy a year to drill and complete 12 wells?
- 3) A review of the Form 2A for related Greeley Roth Federal 16-1 Pad location indicates these production facilities will be within 1,000 feet of a Building Unit. Therefore the two check boxes in the Cultural Setback Distance on this Bluff Federal State 40-1 Pad Form 2A should be checked and a siting rationale for the Greeley Roth Federal 16-1 Pad location should be included. For expediency sake, we can just include a statement in the Siting Rationale comment box that the siting rationale for the Greeley Roth Federal 16-1 Pad location can be found on the Form 2A (Doc #401442766) for that production facility.
- 4) In the Water Resources section Noble Energy has indicated the nearest downgradient surface water feature is 1,838 feet away. Topographic downgradient appears to be to the north. A review of the Hydrology Map indicates there is marshland 338 feet to the northwest. This marshland is also part of a mapped wetland. Therefore, I would like to change the distance to the nearest downgradient surface water feature to 338 feet.
- 6) Many of the BMPs included on this Form 2A reference various rule requirements from Rule 604.c(2). Rule 604.c(2). deals with requirements for locations within a Buffer Zone. We appreciate SRC Energy going the extra step and including some of these BMPs even though this location is not a Buffer Zone location and would like to retain them on this Form 2A. To avoid any possible confusion some of the public have had when they see BMPs listed as being required by Rule 604.c.(2) with locations that are not in a Buffer Zone, we would like to remove the various 604.c.(2) citations that are included with these BMPs. For example, change the Rule 604.c.(2)D - Traffic Plan BMP to just be listed as a Traffic Plan BMP, etc. Please let me know if that is acceptable.
- 7) SRC Energy has included some BMPs that deal with production facilities. As this proposed Oil & Gas Location will only have wells, I'd like to remove the Tank Specification and Berm Construction BMPs.
- 8) In the 803 Light mitigation BMP SRC Energy has a statement indicating "*Once the drilling and completion rigs leave the site, lighting usually exists on the entrance/exit doors to the LACT units and Instrument Air skids, all for safety.*" This statement references production facilities that are not listed in the Facilities section. Please revise this statement to only indicate what will happen with lighting once the drilling and completion rigs leave the site.

Please respond to this correspondence by January 5, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180

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

Wed, Dec 13, 2017 at 9:05 AM

Doug

Answers are in red below. You are only waiting on me for an answer on question 8. I should have this by end of day.



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: Tuesday, December 05, 2017 2:46 PM
To: Erin Ekblad <EEkblad@srcenergy.com>
Subject: COGCC Form 2A review of SRC Energy's Bluff Federal State 40-1 Pad location - Doc #401452969

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 provide a rather large pipeline description listing what seems like a lot of pipelines for a well only pad. Are all of the pipelines described on the Form 2A going to be in place on this location?

Sorry for the confusion on this one. I just verified with facilities engineer: The following pipe will be on this well only pad.

3" Schedule 160, FBE coated, smls, A106

2" Schedule 80, FBE coated, smls or ERW, A106

2) In the Construction section SEC Energy has indicated that interim reclamation will begin on 6/19/19. This more than a year after construction is planned to commence. This seems like a rather long time for the disturbed area to remain unreclaimed. Is it going to take SRC Energy a year to drill and complete 12 wells?

The interim reclamation date is still fairly accurate. The anticipated construction date can now be pushed back after we rearranged the schedule to 9/1/2018

3) A review of the Form 2A for related Greeley Roth Federal 16-1 Pad location indicates these production facilities will be within 1,000 feet of a Building Unit. Therefore the two check boxes in the Cultural Setback Distance on this Bluff Federal State 40-1 Pad Form 2A should be checked and a siting rationale for the Greeley Roth Federal 16-1 Pad location should be included. For expediency sake, we can just include a statement in the Siting Rationale comment box that the siting rationale for the Greeley Roth Federal 16-1 Pad location can be found on the Form 2A (Doc #401442766) for that production facility.

This is fine with SRC ENERGY.

4) In the Water Resources section Noble Energy has indicated the nearest downgradient surface water feature is 1,838 feet away. Topographic downgradient appears to be to the north. A review of the Hydrology Map indicates there is marshland 338 feet to the northwest. This marshland is also part of a mapped wetland. Therefore, I would like to change the distance to the nearest downgradient surface water feature to 338 feet.

This is fine with SRC ENERGY.

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This is fine with SRC ENERGY.

7) SRC Energy has included some BMPs that deal with production facilities. As this proposed Oil & Gas Location will only have wells, I'd like to remove the Tank Specification and Berm Construction BMPs.

This is fine with SRC ENERGY. This is fine with SRC ENERGY.

8) In the 803 Light mitigation BMP SRC Energy has a statement indicating "*Once the drilling and completion rigs leave the site, lighting usually exists on the entrance/exit doors to the LACT units and Instrument Air skids, all for safety.*" This statement references production facilities that are not listed in the Facilities section. Please revise this statement to only indicate what will happen with lighting once the drilling and completion rigs leave the site.

Please respond to this correspondence by January 5, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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

Wed, Dec 13, 2017 at 9:08 AM

For number 8, 803 Light mitigation, where would you like lights? I checked with Production Facilities engineer, and they noted lighting exists only on production facility side of the entire pad (so on Greeley Rothe)



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: Tuesday, December 05, 2017 2:46 PM

To: Erin Ekblad <EEKblad@srcenergy.com>

Subject: COGCC Form 2A review of SRC Energy's Bluff Federal State 40-1 Pad location - Doc #401452969

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

Wed, Dec 13, 2017 at 10:33 AM

To: Erin Ekblad <EEKblad@srcenergy.com>

Erin,

What I'm getting at with the Lighting BMP is that it mentions lights associated with production facilities (LACT Unit & Instrument Air skids) No production facilities are listed in the Facilities section at all, so either that sentence in the Rule 803 Lighting BMP should be revised to not mention them or the Facilities section needs to be updated to include any production facilities that will be on this location.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Erin Ekblad <EEKblad@srcenergy.com>

Wed, Dec 13, 2017 at 10:36 AM

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

Oh ok! Let's just revise to not mention the facilities then. So no lighting on facilities on this pad.



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

Sent: Wednesday, December 13, 2017 10:33 AM

To: Erin Ekblad <EEKblad@srcenergy.com>

Subject: Re: COGCC Form 2A review of SRC Energy's Bluff Federal State 40-1 Pad location - Doc #401452969

[Quoted text hidden]

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

Wed, Dec 13, 2017 at 10:48 AM

To: Erin Ekblad <EEKblad@srcenergy.com>

"So no lighting on facilities on this pad."

Does this mean there will be production facilities on this pad and they won't have permanent lighting or there won't be any production facilities on this pad at all?

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Erin Ekblad <EEKblad@srcenergy.com>

Wed, Dec 13, 2017 at 4:33 PM

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

There won't be any production facilities on this pad at all with the exception of the MLVT that is listed on the 2A.



SRC ENERGY

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

Sent: Wednesday, December 13, 2017 10:48 AM

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