



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

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**RE: [EXTERNAL] :Form 4 Sundry for PDC Energy's Simonsen-Schaefer 6L-HZ Pad - Doc #401525057**

1 message

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**Alexandria Ota** <Alexandria.Ota@pdce.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Fri, Feb 9, 2018 at 9:54 AM

Good Morning Doug,

Happy Friday!

Attached is an updated facility layout drawing. BMPs and distances are laid out below.

Thank you!

 Ally Ota | Regulatory Technician | PDC Energy, Inc. | O: 303-831-3931 | F: 303-860-5838

**Please note new email address: [Alexandria.Ota@pdce.com](mailto:Alexandria.Ota@pdce.com)**

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Friday, January 26, 2018 12:18 PM  
**To:** Alexandria Ota <[Alexandria.Ota@pdce.com](mailto:Alexandria.Ota@pdce.com)>  
**Subject:** [EXTERNAL] :Form 4 Sundry for PDC Energy's Simonsen-Schaefer 6L-HZ Pad - Doc #401525057

Ally,

I have a couple of comments on this Sundry.

1) The original Form 2A for this location was approved before the adoption of the Designated Setback Location rules. So we do not know the distance to the nearest Building Unit. Aerial photos do appear to indicate there are Building Units within 500 feet. Please provide a Facility Layout Drawing and the distance to the nearest Building Unit from the nearest production facility and which piece of production facility equipment will be the closest.

The distance to the nearest Building Unit was measured at 310' from an oil tank.

2) Because this location now appears to be in an Exception Zone, please provide BMPs that discuss the mitigation of nuisance conditions (noise, dust, lights, odors, & visual impacts).

- 604c.(2).A. Noise: PRODUCTION FACILITIES: It is not anticipated that noise mitigation will be necessary at the proposed tank battery location. After construction is completed, equipment installed and production begins, noise levels will be assessed to determine if mitigation measures will be required to be compliant with Rule 802.
- 804. Visual Impact: Production facilities, regardless of construction date, which are observable from any public highway will be painted with uniform, non-contrasting, non-reflective color tones (similar to the Munsell Soil Color Coding System), and with colors matched to but slightly darker than the surrounding landscape.
- 805.b(1)-(c) Odors and Dust: Oil and gas facilities and equipment (PERMANENT AND TEMPORARY) will operate in a manner that odors and dust do not constitute a nuisance or hazard to public welfare. Odors: Oil and gas operations will be in compliance with the Department of Public Health and Environment, Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. Temporary and permanent water tanks do not require additional BMPs as PDC has historically not had any odor issues.

Dust; PDC will employ practices for control of fugitive dust caused by operations, these include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic. During winter operations normal dust abatement is not provided unless requested by surrounding land owners. Fugitive dust control will be incorporated as needed during all other months of drilling and completion operations.

- 604.c.(2).W. Site Specific Measures: Lights should be turned downward and away from building units within the 1,000 foot buffer area. Dust mitigation will be provided as necessary on lease access roads.

3) Because this location now appears to be in an Exception Zone, would PDC Energy be willing to notify the Building Unit owners within 1,000 feet of the planned additions to this location? We think its important for operators in Colorado to be good neighbors and keep nearby residents update with changes to locations.

PDC is contacting all Building Unit owners within 1,000' of this location to update them with the changes to the production facility.

Please call me if you have any questions.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



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