

STATE OF
COLORADO

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

RE: [EXTERNAL] :Form 4 Sundry for the Alm 33V-HZ South Pad & Alm 33V-HZ North Pad - Doc #401524605 & 401524629

4 messages

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

Fri, Jan 26, 2018 at 12:45 PM

Hi Doug,

Attached are revised scaled facilities adding the water vaults to both Alm pads. The drawings are correct with 13 oil tanks. I made an error on the sundries in stating there would be 17 total, I was including the water tanks in my count.

I will have to have surveyors go back out on all of the locations you've sent emails on to re-survey distances to the nearest BU, as well as get scaled facility drawings on most of those since they were never done in the past.

I've got a call into our surface land group to see if contact has been made with BU owners already, since many of these locations are very close to homes.

I will follow up with you next week. Thanks and have a great weekend!

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

Please note new email address: Alexandria.Ota@pdce.com

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Friday, January 26, 2018 11:23 AM

To: Alexandria Ota <Alexandria.Ota@pdce.com>

Subject: [EXTERNAL] :Form 4 Sundry for the Alm 33V-HZ South Pad & Alm 33V-HZ North Pad - Doc #401524605 & 401524629

Ally,

I have a couple of comments on these two Sundrys.

1) Both Sundrys indicates there will be 17 oil tanks, but the included Facility Drawings shows 13 oil tanks (12 existing/1 new) and 4 water tanks. Also, aerial photos show what appear to be two water vaults next to both tank batteries. We need the Facility Drawings to accurately reflect what is being proposed and what is currently existing on these locations.

2) The original Form 2A for both locations were approved before the adoption of the Designated Setback Location rules. So we do not know the distance to the nearest Building Unit for each location. Aerial photos do appear to indicate there are Building Units within 1,000 feet. Please give us the distance to the nearest Building Unit from the nearest production facility on both locations and which piece of production facility equipment is the closest on both locations.

3) Because these locations now appears to be in a Buffer Zone, please provide BMPs that discuss the mitigation of nuisance conditions (noise, dust, lights, odors, & visual imapcts) from these locations.

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

Please call me if you have any questions.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180

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

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

2 attachments

UPDATED SCALED FACILITY_33V-HZ NORTH (2018-01-24).pdf
171K

UPDATED SCALED FACILITY_33V-HZ SOUTH (2018-01-24).pdf
173K

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

Mon, Jan 29, 2018 at 7:58 AM

Good Morning Doug,

As far as landowner contact goes, will PDC certifying that we've made phone calls with all BU owners be sufficient? Or will we need to send in copies of letters that we've sent to each owner?

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

From: Alexandria Ota

Sent: Friday, January 26, 2018 12:45 PM

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

Subject: RE: [EXTERNAL] :Form 4 Sundry for the Alm 33V-HZ South Pad & Alm 33V-HZ North Pad - Doc #401524605 & 401524629

[Quoted text hidden]

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

Mon, Jan 29, 2018 at 8:26 AM

To: Alexandria Ota <Alexandria.Ota@pdce.com>

Ally,

Will PDC certifying that we've made phone calls with all BU owners be sufficient? - [Yes that will be acceptable.](#)

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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[Quoted text hidden]

Alexandria Ota <Alexandria.Ota@pdce.com>

Wed, Feb 14, 2018 at 10:21 AM

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

Hi Doug,

The distance to the nearest Building Unit on the Alm 33V-HZ North pad (Doc 401524629) is 553', measured from an oil tank.

The distance to the nearest Building Unit on the Alm 33V-HZ South pad (Doc 401524605) is 586', measured from an oil tank.

BMPs for both pads are listed below. PDC is contacting all Building Unit owners within 1,000' of these locations to update them with the changes to the production facility.

Please let me know if you need anything else! 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

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

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2) The original Form 2A for both locations were approved before the adoption of the Designated Setback Location rules. So we do not know the distance to the nearest Building Unit for each location. Aerial photos do appear to indicate there are Building Units within 1,000 feet. Please give us the distance to the nearest Building Unit from the nearest production facility on both locations and which piece of production facility equipment is the closest on both locations.

3) Because these locations now appears to be in a Buffer Zone, please provide BMPs that discuss the mitigation of nuisance conditions (noise, dust, lights, odors, & visual impacts) from these locations.

- 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.

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

Please call me if you have any questions.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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