



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

COGCC Form 2A review of SRC Energy's Greeley-Rothe Federal 16-1 Pad location - Doc #401529896

10 messages

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

Fri, Feb 23, 2018 at 2:30 PM

Erin,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) It appears the northern most portion of this proposed Oil & Gas Location will overlie the 24-Fort Collins loam, 1 to 3 percent slopes NRCS Soil Map Unit. Please provide the Soil Description attachment for this Soil Unit and I will add it to the Form 2A.
- 2) In the Cultural Setback Distance section SRC Energy has indicated the nearest Building is 1,237 feet from the nearest production facility. During my review it appears the Gas Lift Skid shown on the Facility Layout Drawing will be approximately 1,135 feet from a Building located due south across 10th Street (Business Hwy 34). Therefore I would like to change the distance of a production facility to the nearest Building from 1,237 feet to 1,135 feet.
- 3) SRC Energy has provided many BMPs that reference Rule 604.c.(2). Rule 604.c.(2) pertains to Buffer Zone locations and this proposed Oil & Gas Location is not in a Buffer Zone. This may possibly lead to confusion by anyone in the public reviewing this Form 2A. I would like to retain all of the BMPs, but remove the 604.c.(2) reference. For example the BMP titled 604.c.(2)M Fencing would just be titled Fencing. Please let me know if this is acceptable.
- 4) SRC Energy has provided a Green Completions - Emissions Control BMP that includes the following statement "*There is a sales line available, SRC plans to turns to sales as soon as possible.*" The wording is rather ambiguous as to exactly when gas will be turned to a sales line. If a sales line is available we would like to revise this BMP to indicate that at the first sign of salable quality gas SRC Energy will send gas to a sales line or the wells will be shut in. Please let me know if SRC Energy can commit to this.
- 5) You have provided an Operator comment explaining that pre-application notices were sent out to nearby Building Unit owners. You have also included an attachment that certifies all Building Unit owners within the Buffer Zone received their pre-application notice. However, this proposed Oil & Gas Location is not technically in a Buffer Zone. Your Operator comment explains this but the attached certification letter indicates there are four Building Units within the Buffer Zone. Again, this may possibly lead to confusion by anyone in the public reviewing this Form 2A. Therefore, I would like to retain your Operator comment but remove the Pre-Application Notification Certification attachment. Please let me know if this is acceptable.

Please respond to this correspondence by March 23, 2018. 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/>

Erin Ekblad <EEkblad@srcenergy.com>

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

Mon, Feb 26, 2018 at 8:36 AM

Doug

I attached Soil Survey 24 for you to this email.

You are only waiting on NUMBER 4 Green Completions question after this email from me.

1. See attached.
2. Yes, This is fine.
3. Yes, This is acceptable.
4. ***** waiting on SRC*****
5. Yes we are OK with this: Therefore, I would like to retain your Operator comment but remove the Pre-Application Notification Certification attachment.



Erin Ekblad

Manager of Regulatory Affairs

1675 Broadway, Suite 2600; Denver, CO 80202

Cell: [303.550.2375](tel:303.550.2375) | Office: [720.616.4319](tel:720.616.4319) | E-mail: EEKBLAD@SRCENERGY.COM

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Friday, February 23, 2018 2:30 PM
To: Erin Ekblad <EEkblad@srcenergy.com>
Subject: COGCC Form 2A review of SRC Energy's Greeley-Rothe Federal 16-1 Pad location - Doc #401529896

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

Mon, Feb 26, 2018 at 9:02 AM

Hi Doug

With regards to question number 4, we would really like to keep it as "SRC Plans to turn to sales as soon as possible" and if we want to add, the Sales line will be there ahead of time.



Erin Ekblad

Manager of Regulatory Affairs

1675 Broadway, Suite 2600; Denver, CO 80202

Cell: [303.550.2375](tel:303.550.2375) | Office: [720.616.4319](tel:720.616.4319) | E-mail: EEKBLAD@SRCENERGY.COM

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Friday, February 23, 2018 2:30 PM

To: Erin Ekblad <EEkblad@srcenergy.com>

Subject: COGCC Form 2A review of SRC Energy's Greeley-Rothe Federal 16-1 Pad location - Doc #401529896

Erin,

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

Mon, Feb 26, 2018 at 9:10 AM

To: Erin Ekblad <EEkblad@srcenergy.com>

Erin,

"As soon as possible" is too ambiguous for us to accept. We are having issues with many operators in the DJ Basin telling us they will tie into a sales line as soon as possible and then end up asking to flare/vent. By the time they tie into a sales line, a large portion of the gas is gone. We just aren't willing to allow this anymore. Operators need to be thinking about and preparing well in advance on how they are going to get the gas to market at the first sign of salable quality gas. Sounds like we need to talk with SRC Energy about this issue. Please let me know when is a good time to discuss this and I will see if John and the Engineer group are available.

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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Erin Ekblad <EEkblad@srcenergy.com>

Mon, Feb 26, 2018 at 9:27 AM

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

Cc: Dave Kulmann <dkulmann@srcenergy.com>

Doug

We would like to have this call this afternoon. Anytime between 1:30-5 pm today works, just let us know when you would be calling.

You can call my direct line, but I would like to bring in Joe Aucoin, and Julie Tannehill along with possibly Dave if he is available.



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: Monday, February 26, 2018 9:11 AM

To: Erin Ekblad <EEKBLAD@SRCENERGY.COM>

Subject: Re: COGCC Form 2A review of SRC Energy's Greeley-Rothe Federal 16-1 Pad location - Doc #401529896

Erin,

"As soon as possible" is too ambiguous for us to accept. We are having issues with many operators in the DJ Basin telling us they will tie into a sales line as soon as possible and then end up asking to flare/vent. By the time they tie into a sales line, a large portion of the gas is gone. We just aren't willing to allow this anymore. Operators need to be thinking about and preparing well in advance on how they are going to get the gas to market at the first sign of salable quality gas. Sounds like we need to talk with SRC Energy about this issue. Please let me know when is a good time to discuss this and I will see if John and the Engineer group are available.

Doug Andrews

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303.894.2100 Ext. 5180

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

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

On Mon, Feb 26, 2018 at 9:02 AM, Erin Ekblad <EEkblad@srcenergy.com> wrote:

Hi Doug

With regards to question number 4, we would really like to keep it as "SRC Plans to turn to sales as soon as possible" and if we want to add, the Sales line will be there ahead of time.



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

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

Mon, Feb 26, 2018 at 9:33 AM

Erin,

I would to have some of our Managers present as well. I will see if this afternoon works for us on our end and get back with 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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Erin Ekblad <EEkblad@srcenergy.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Dave Kulmann <dkulmann@srcenergy.com>

Mon, Feb 26, 2018 at 9:44 AM

Hi Doug

Thank you for offering a conversation with your staff. We sat down internally and we are ok with the BMP being changed. And to be proactive, can we update this with both the Bluff Federal State 40-1 Pad that you had recently taken off HOLD and the Lincoln State 3-18 Pad? It sounds like we do not need a meeting today about this after getting the confirmation from both Facilities and Completions that we are OK with changing the BMP.



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: Monday, February 26, 2018 9:34 AM

To: Erin Ekblad <EEkblad@srcenergy.com>

Cc: Dave Kulmann <dkulmann@srcenergy.com>

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

To: Erin Ekblad <EEkblad@srcenergy.com>

Cc: Dave Kulmann <dkulmann@srcenergy.com>

Mon, Feb 26, 2018 at 10:22 AM

Erin,

Thanks for the quick reply. How does this Green Completion BMP sound?

Green Completions - Emission Control System: Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completions techniques pursuant to COGCC Rules. The flowback gas shall be sold or shall be captured and combusted with an Emissions Control Device (ECD), which will be installed and kept in operable condition for least the first 90-days of production pursuant to CDPHE rules. This ECD shall have an adequate capacity for 1.5 times the largest flowback within a 10 mile radius, and will be piped to other or permanent equipment and shall be provided with the equipment needed to maintain combustions where non-combustible gases are present. There is a sales line available, *at the first sign of salable quality gas SRC Energy will turn the gas to a sales line.*

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



303.894.2100 Ext. 5180

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

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Erin Ekblad <EEkblad@srcenergy.com>

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

Cc: Dave Kulmann <dkulmann@srcenergy.com>

Mon, Feb 26, 2018 at 12:41 PM

Thank you Doug. I have this sent out to Julie Tannehill and Joe Aucoin. They will let me know if they are good with the BMP. I will keep you updated as soon as I hear back.



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: Monday, February 26, 2018 10:22 AM

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Erin Ekblad <EEkblad@srcenergy.com>

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

Mon, Feb 26, 2018 at 3:23 PM

Cc: Dave Kulmann <dkulmann@srcenergy.com>

Doug

Per Completions and Facilities we are good with this BMP for SRC to be modified.



Erin Ekblad

Manager of Regulatory Affairs

1675 Broadway, Suite 2600; Denver, CO 80202

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

Sent: Monday, February 26, 2018 10:22 AM

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