

STATE OF
COLORADO

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

COGCC Form 2A review of Nickel Road Operating's DEHAAN NORTH PAD location - Doc #401515559

2 messages

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

Tue, Feb 20, 2018 at 8:35 AM

To: Kit Tincher <kit.tincher@nickelroadoperating.com>, Jennifer Lind <jen@jenlindllc.com>

Kit & Jennifer,

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

- 1) It appears that Nickel Road intends to utilize MLVTs on this location for well completions. However, the Facilities section does not list the count of MLVTs. From the drawings it appears there will be two MLVTs utilized. Therefore, I would like to update the Facilities section to list two (2) MLVTs.
- 2) In the Land Use section Nickel Road has checked both the Rangeland and the Other boxes. From my review of the Location Pictures and aerial photos it appears that just checking the Other box is appropriate as this area does not fit what we consider Rangeland to be. Also, is the manure actually being stockpiled for later use? Would a better description be "Manure spreadfield"?
- 3) In the Water Resources section Nickel Road has indicated the nearest water well is 116 feet from the proposed Oil & Gas Location. If a water well is this close it should be shown on the Location Drawing. However, no water well is identified within 500 feet of the proposed Oil & Gas Location on the Location Drawing. Please confirm what the nearest water well is and where it is located. If there is a water well within 500 feet of the proposed Oil & Gas Location, please revise the Location Drawing to include it.
- 4) In the Water Resources section Nickel Road has indicated the estimated depth to groundwater is 680 feet based on water well permit #232245-A. A review of that water well's permit documents indicate that well was only drilled to a depth of 463 feet and lists a static water level of 116 feet. The next nearest water well (Permit #5819 located approximately 1,000 feet to the northeast) lists a depth to water of 9 feet. Given that there are several nearby ponds, an estimated depth to groundwater of 9 feet seems reasonable. Therefore, I would like to change the estimated depth to groundwater from 680 feet to 9 feet
- 5) As we spoke about with Jennifer in a phone conversation on Friday February 16, we would like to replace your Green Completions BMP with the following:

Green Completions -Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, the operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.
- 6) Now that the Public Comment period has ended, please provide me with a letter certifying Nickel Road's compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Please respond to this correspondence by March 20, 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/>**Jennifer Lind** <jen@jenlindllc.com>To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>Cc: Kit Tinchler <kit.tinchler@nickelroadoperating.com>

Thu, Mar 8, 2018 at 7:56 AM

Doug, please see NRO's responses below in red.

Thank you!
Jennifer**Jennifer Lind**

Owner, Regulatory Specialist

303-406-1117 | jen@jenlindllc.com | www.jenlindllc.com

----- Forwarded message -----

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

Date: Tue, Feb 20, 2018 at 8:35 AM

Subject: COGCC Form 2A review of Nickel Road Operating's DEHAAN NORTH PAD location - Doc #401515559

To: Kit Tinchler <kit.tinchler@nickelroadoperating.com>, Jennifer Lind <jen@jenlindllc.com>

Kit & Jennifer,

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

1) It appears that Nickel Road intends to utilize MLVTs on this location for well completions. However, the Facilities section does not list the count of MLVTs. From the drawings it appears there will be two MLVTs utilized. Therefore, I would like to update the Facilities section to list two (2) MLVTs. **Please update the facilities section to include 2 MLVTs - my apologies for the oversight on the original submittal.**

2) In the Land Use section Nickel Road has checked both the Rangeland and the Other boxes. From my review of the Location Pictures and aerial photos it appears that just checking the Other box is appropriate as this area does not fit what we consider Rangeland to be. Also, is the manure actually being stockpiled for later use? Would a better description be "Manure spreadfield"? **Please leave "Other" checked and update description to manure spreadfield (that is a much better description, thank you for the suggestion).**

3) In the Water Resources section Nickel Road has indicated the nearest water well is 116 feet from the proposed Oil & Gas Location. If a water well is this close it should be shown on the Location Drawing. However, no water well is identified within 500 feet of the proposed Oil & Gas Location on the Location Drawing. Please confirm what the nearest water well is and where it is located. If there is a water well within 500 feet of the proposed Oil & Gas Location, please revise the Location Drawing to include it. **Nearest water well is located ~670' south of the proposed location, see attached screenshot. Please update the distance on the Form 2A accordingly, no new location drawing required at this time.**

4) In the Water Resources section Nickel Road has indicated the estimated depth to groundwater is 680 feet based on water well permit #232245-A. A review of that water well's permit documents indicate that well was only drilled to a depth of 463 feet and lists a static water level of 116 feet. The next nearest water well (Permit #5819 located approximately 1,000 feet to the northeast) lists a depth to water of 9 feet. Given that there are several nearby ponds, an estimated depth to groundwater of 9 feet seems reasonable. Therefore, I would like to change the estimated depth to groundwater from 680 feet to 9 feet. **Please update estimated depth to groundwater to 9' and update reference well as necessary.**

5) As we spoke about with Jennifer in a phone conversation on Friday February 16, we would like to replace your Green Completions BMP with the following:

Green Completions -Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, the operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.

Please replace the current green completion BMP with the provided language.

6) Now that the Public Comment period has ended, please provide me with a letter certifying Nickel Road's compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome. **Certification letter attached.**

Please respond to this correspondence by March 20, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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303.894.2100 Ext. 5180

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

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2 attachments



DeHaan North_Form 2A 306e Cert.pdf

3/8/2018

State.co.us Executive Branch Mail - COGCC Form 2A review of Nickel Road Operating's DEHAAN NORTH PAD location - Doc #401515559

92K



COGCC GISOnline_DeHaan North Pad & Water Wells.pdf

184K