



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

COGCC Form 2A review of Extraction's Lind 26-D location - Doc #401539833

2 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Alyssa Andrews <aandrews@extractionog.com>

Mon, Mar 26, 2018 at 11:45 AM

Alyssa,

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

- 1) In the Construction section Extraction has indicated the date planned to commence construction is 4/1/18. However, the related Form 2 APDs for this location, while submitted, are not yet In Process to be reviewed. Therefore, this date does not appear to be realistic. Please provide me an update to the date planned to commence construction and also begin interim reclamamtion.
- 2) In the Water Resources section Extraction has indicated that groundwater is approximately 10 feet in depth and there are several surface water features and wetlands in very close proximity to the proposed Oil & Gas Location. Therefore, I would like to change the Water Resources section to indicate YES this is a sensitive area.
- 3) Extraction has provided an Emissions mitigation BMP that indicates "*Operator will bring a new or expand existing gas sales lines, in a timely manner, to send salable quality gas immediately down the sales line.*" The phrase "*in a timely manner*" is too ambiguous and this BMP needs to be revised to be more specific as to when gas will be sent to a sales line. This BMP should also discuss what Extraction's plans are if a gas sales line is not available at the first sign of salable gas.
- 4) Now that the Public Comment period has ended, please send a letter certifying Extraction's compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Please respond to this correspondence by April 26, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Alyssa Andrews <aandrews@extractionog.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Kelsi Welch <kwelch@extractionog.com>

Mon, Apr 9, 2018 at 9:45 AM

Hi Doug,

I'm still waiting on a couple consultation summaries, but here are the answers to questions 1-3 below.

Thanks,

Alyssa Andrews

Regulatory Analyst



Direct: (720) 481-2379

Cell: (425) 652-2811

aandrews@ExtractionOG.com

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Monday, March 26, 2018 11:45 AM
To: Alyssa Andrews <aandrews@extractionog.com>
Subject: COGCC Form 2A review of Extraction's Lind 26-D location - Doc #401539833

Alyssa,

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

- 1) In the Construction section Extraction has indicated the date planned to commence construction is 4/1/18. However, the related Form 2 APDs for this location, while submitted, are not yet In Process to be reviewed. Therefore, this date does not appear to be realistic. Please provide me an update to the date planned to commence construction and also begin interim reclamamtion. **Please change to 7/1/18 & 10/1/18 respectively.**

- 2) In the Water Resources section Extraction has indicated that groundwater is approximately 10 feet in depth and there are several surface water features and wetlands in very close proximity to the proposed Oil & Gas Location. Therefore, I would like to change the Water Resources section to indicate YES this is a sensitive area. **Please change to YES.**

- 3) Extraction has provided an Emissions mitigation BMP that indicates "*Operator will bring a new or expand existing gas sales lines, in a timely manner, to send salable quality gas immediately down the sales line.*" The phrase "*in a timely manner*" is too ambiguous and this BMP needs to be revised to be more specific as to when gas will be sent to a sales line. This BMP should also discuss what Extraction's plans are if a gas sales line is not available at the first sign of salable gas.

Please revise to the following BMP:

Operator will bring a new or expand existing gas sales lines, prior to first gas sales, in a timely manner, to send salable quality gas immediately down the sales line. 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.

- 4) Now that the Public Comment period has ended, please send a letter certifying Extraction's compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Please respond to this correspondence by April 26, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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