STATE OF COLORADO

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

COGCC Form 2A review of Enerplus Resources' Alberta Cities East Pad - Doc #401541602

4 messages

Andrews - DNR, Doug <doug.andrews@state.co.us> Mon, Apr 16, 2018 at 2:03 PM
To: Sarah Miller <smiller@enerplus.com>

Sarah,

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

1) In the pipeline description Enerpkus has included a statement indicating "*Meter Buildings, Air Compressor, Vapor Recovery Unit, Electric Generators, Gas Compressors and LACT Units will be located in the Proposed Compression Area depicted in figure 5, the interim reclamation plan with all the facilities shown. The pigging station will be located near the lease entrance.*" This figure was not included with the Form 2A. Please provide this figure and I will attach it to the Form 2A.

2) Enerplus has provided a Green Completions-Emission Control Systems BMP that includes the following statement "*In the anticipated absence of a viable gas sales line, the flowback gas shall be combusted in an emissions control device (ECD), which will be installed and kept in operable condition for at least the first 90-days of production pursuant to CDPHE rules.*" This is troubling as it appears to indicate gas from any well on this pad will be flared/burned for at least 90 days, whether it is flowback or of salable quality. Or does this pertain only to the two exploratory wells Enerplus has indicated they will drill in 2019?

3) In an email correspondence we had back in January 2018 about this pad and the Alberta Cities West Pad, you asked if it was okay to have all of the topsoil piles for both locations on one pad. I provided some guidance on how to handle that, but do not see any mention of topsoil pile handling on this Form 2A. Will any topsoil from the Alberta Cities West pad be stockpiled on this location or will the topsoil from this Alberta Cities East pad be stockpiled on that location?

Please respond to this correspondence by May 16, 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

303.894.2100 Ext. 5180
1120 Lincoln St., Suite 801, Denver, CO 80203
doug.andrews@state.co.us | http://cogcc.state.co.us/

Sarah Miller <smiller@enerplus.com> Wed, May 2, 2018 at 3:31 PM
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Hi Doug –

Please find my comments below. Please let me know if you have any questions.

Thank you!

Sarah

Sarah Miller
Permitting Technician
US Operations
enerPLUS
950-17th Street
Suite 2200
Denver, CO 80202-2805
T. 720-279-5512
www.enerplus.com

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Monday, April 16, 2018 2:04 PM
To: Sarah Miller <smiller@enerplus.com>
Subject: COGCC Form 2A review of Enerplus Resources' Alberta Cities East Pad - Doc #401541602

Sarah,

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

1) In the pipeline description Enerpkus has included a statement indicating "*Meter Buildings, Air Compressor, Vapor Recovery Unit, Electric Generators, Gas Compressors and LACT Units will be located in the Proposed Compression Area depicted in figure 5, the interim reclamation plan with all the facilities shown. The pigging station will be located near the lease entrance.*" This figure was not included with the Form 2A. Please provide this figure and I will attach it to the Form 2A. Please see attached.

2) Enerplus has provided a Green Completions-Emission Control Systems BMP that includes the following statement "*In the anticipated absence of a viable gas sales line, the flowback gas shall be combusted in an emissions control device (ECD), which will be installed and kept in operable condition for at least the first 90-days of production pursuant to CDPHE rules.*" This is troubling as it appears to indicate gas from any well on this pad will be flared/burned for at least 90 days, whether it is flowback or of salable quality. Or does this pertain only to the two exploratory wells Enerplus has indicated they will drill in 2019? This would pertain to only the two exploratory wells.

3) In an email correspondence we had back in January 2018 about this pad and the Alberta Cities West Pad, you asked if it was okay to have all of the topsoil piles for both locations on one pad. I provided some guidance on how to handle that, but do not see any mention of topsoil pile handling on this Form 2A. Will any topsoil from the Alberta Cities West pad be stockpiled on this location or will the topsoil from this Alberta Cities East pad be stockpiled on that location? At this time, we have a space for each pad to have its own location for topsoil stock piling. If we run into thicker topsoil than we anticipate is this something we can sundry down the road if need be?

Please respond to this correspondence by May 16, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

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Alberta Cities EAst - Figure 5.pdf
726K

Andrews - DNR, Doug <doug.andrews@state.co.us> Thu, May 3, 2018 at 10:42 AM
To: Sarah Miller <smiller@enerplus.com>

Sarah,

A little more follow-up on the Green Completions-Emission Control Systems BMP if you don't mind. There was a similar BMP originally on the Colorado Mammals Pad. In discussions with Enerplus they provided the following addition to this BMP: *Prior to production, Enerplus will investigate options for bringing a gas sales line to the location. After production begins, Enerplus will connect to a gas sales as soon as practicable and as necessary to comply with any applicable flaring allowances as granted by the COGCC and limitations imposed by the CDPHE. In the event connecting to a gas sales line is delayed, Enerplus will explore other gas utilization methods such as NGL recovery units, a combination of NGL recovery and CNG, other means of beneficial use, or gas powered electric generators.*

Is this acceptable to add to the BMP on this 2A (and the Alberta Cities West Pad 2A)? Also, burning the gas for 90 days will require Enerplus to get a Variance from our Rule 805.b.(3) beforehand.

Doug Andrews
Oil & Gas Location Assessment Specialist - Northeast Colorado

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[Quoted text hidden]

Sarah Miller <smiller@enerplus.com> Thu, May 3, 2018 at 11:55 AM
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Scott Mason <scottmason@enerplus.com>

Hey Doug – can we just go with this as our green completions BMP for both pads?

Green Completions BMP –

The first well drilled to the west into sections 19 and 20, T8N-R67W, regardless if drilled from the Alberta Cities East Pad or the Alberta Cities West Pad, will be considered the exploratory well for that spacing unit (535-886). The first well drilled to the east into sections 21 and 22, T8N-R67W, regardless if drilled from the Alberta Cities East Pad or the Alberta Cities West Pad, will be considered the exploratory well for that spacing unit (535-887). Prior to production, Enerplus will investigate options for bringing a gas sales line to the location. After production begins, Enerplus will connect to a gas sales as soon as practicable and as necessary to comply with any applicable flaring allowances as granted by the COGCC and limitations imposed by the CDPHE. In the event connecting to a gas sales line is delayed, Enerplus will explore other gas utilization methods such as NGL recovery units, a combination of NGL recovery and CNG, other means of beneficial use, or gas powered electric generators.

Thanks!

Sarah

Sarah Miller
Permitting Technician
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From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Thursday, May 3, 2018 10:42 AM
To: Sarah Miller <smiller@enerplus.com>
Subject: Re: COGCC Form 2A review of Enerplus Resources' Alberta Cities East Pad - Doc #401541602

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Sarah

Sarah Miller
Permitting Technician
US Operations

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