



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

**COGCC Form 2A review of Bayswater Exploration's EAST AULT 18-C PAD location - Doc #401568882**

9 messages

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

To: Paul Gottlob <paul.gottlob@iptenergyservices.com>

Fri, May 4, 2018 at 8:24 AM

Paul,

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

- 1) In the Facilities section Bayswater Exploration has indicated there will be one MLVT used on this location. However, none of the drawings show where the MLVT will be placed on the location. This is a requirement of the MLVT Policy on the Use of MLVTs. Please provide me either a revised Location Drawing or revised Facility Layout Drawing showing where the MLVT will be placed.
- 2) When production facilities are located within 1,000 feet of a Building Unit, the following box must be checked on the Form 2A to indicate Bayswater Explorations's compliance with Rule 604.c.(2)E.i.

**FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:**

☒ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on- or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit.

*(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*

☒ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

The nearest Building Unit is owned by the Surface Owner and the placement of these wells and facility equipment were chosen and approved by the Surface Owner.

Therefore, I would like to check this box on the Form 2A.

- 3) In the Water Resources section Bayswater Exploration has indicated the nearest downgradient surface water feature is 901 feet away. However, the sensitive area determination comment in this same section indicates the nearest downgradient surface water feature is a concrete irrigation ditch 35 feet west of the location. Therefore, I would like to change the distance to the nearest downgradient surface water feature from 901 feet to 35 feet.
- 4) In the Water Resources section Bayswater Exploration has indicated the nearest water well is 406 feet away. However, the sensitive area determination comment in this same section indicates the nearest water well is Permit #1577-R 34 feet northwest of the location. Therefore, I would like to change the distance to the nearest water well from 406 feet to 34 feet.
- 5) The COGCC Policy on the Use of MLVTs requires operators to provide the following information on the Form 2A:





**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](mailto:doug.andrews@state.co.us) | <http://cogcc.state.co.us/>

[Quoted text hidden]

**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>  
Cc: Derek Petrie <derek.petrie@iptenergyservices.com>

Fri, May 4, 2018 at 8:50 AM

Doug,

Replies below after each in RED.

Let me know if you need anything else.

**PAUL GOTTLOB**

## Regulatory & Engineering Technician

P: 720.420.5747

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Integrated Petroleum Technologies, Inc. | 1707 Cole Blvd, Suite 200 | Golden, CO 80401

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Friday, May 4, 2018 8:25 AM  
**To:** Paul Gottlob <[paul.gottlob@iptenergyservices.com](mailto:paul.gottlob@iptenergyservices.com)>  
**Subject:** COGCC Form 2A review of Bayswater Exploration's EAST AULT 18-C PAD location - Doc #401568882

Paul,

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

1) In the Facilities section Bayswater Exploration has indicated there will be one MLVT used on this location. However, none of the drawings show where the MLVT will be placed on the location. This is a requirement of the MLVT Policy on the Use of MLVTs. Please provide me either a revised Location Drawing or revised Facility Layout Drawing showing where the MLVT will be placed. **Will get this ordered and sent to you when received.**

2) When production facilities are located within 1,000 feet of a Building Unit, the following box must be checked on the Form 2A to indicate Bayswater Explorations's compliance with Rule 604.c.(2)E.i.

**FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:**

☒ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on- or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit.

*(Pursuant to Rule 604.c.(2)E.I., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*

☒ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.I.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.I determination. Attach documentation that supports your determination to this Form 2A.

The nearest Building Unit is owned by the Surface Owner and the placement of these wells and facility equipment were chosen and approved by the Surface Owner.

Therefore, I would like to check this box on the Form 2A. **Agreed.**

3) In the Water Resources section Bayswater Exploration has indicated the nearest downgradient surface water feature is 901 feet away. However, the sensitive area determination comment in this same section indicates the

Agreed.

4) In the Water Resources section Bayswater Exploration has indicated the nearest water well is 406 feet away. However, the sensitive area determination comment in this same section indicates the nearest water well is Permit #1577-R 34 feet northwest of the location. Therefore, I would like to change the distance to the nearest water well from 406 feet to 34 feet. **Agreed.**

- \* Manufacturer or vendor of the MLVT, **Hydro Logistics**
- \* Size of the MLVT (in either barrels or dimensions), **42,000 bbl – 157' diameter – pad for this is 200' x 200'.**
- \* Anticipated time frame the MLVT will be onsite, **Aprx. 90 days – while all wells are being fracked.**
- \* Operator's certification the MLVT will be designed and implemented consistent with the COGCC Policy.  
**rtification is on file with the Operator.**

6) Now that the Public Comment period has ended, please provide a letter certifying Bayswater Exploration's compliance with COGCC Rule 306.e. If any meetings/consultation were requested by the public, please also indicate their outcome. **Attached.**

Please respond to this correspondence by June 4, 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/>



**306.e Certification Letter - East Ault Pad.pdf**  
99K

**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>  
Cc: Derek Petrie <derek.petrie@iptenergyservices.com>

Fri, May 4, 2018 at 8:51 AM

Doug,

Yes we have spoken with Troy Swain and are in process of getting this resolved and will supply you with the needed documentation.

Thanks!

**PAUL GOTTLOB**

## Regulatory & Engineering Technician

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Integrated Petroleum Technologies, Inc. | 1707 Cole Blvd, Suite 200 | Golden, CO 80401

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Fri, May 4, 2018 at 9:06 AM

Thanks.

Oil &amp; Gas Location Assessment Specialist - Northeast Colorado



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Fri, May 4, 2018 at 9:08 AM

Yes that is OK!

[https://mail.google.com/mail/u/0/?ui=2&ik=6cde1142d7&jsvr=GAFHaMvshdw.en.&cbl=gmail\\_fe\\_180506.06\\_p7&view=pt&search=inbox&th=1636a9f8278972ff&sml=1632b8a9e14f86af&sml=1632b8e89b68492c&sml](https://mail.google.com/mail/u/0/?ui=2&ik=6cde1142d7&jsvr=GAFHaMvshdw.en.&cbl=gmail_fe_180506.06_p7&view=pt&search=inbox&th=1636a9f8278972ff&sml=1632b8a9e14f86af&sml=1632b8e89b68492c&sml)



Thank you!

[https://mail.google.com/mail/u/0/?ui=2&ik=6cde1142d7&jsver=GAFHaMvshdw.en.&cbl=gmail\\_fe\\_180506.06\\_p7&view=pt&search=inbox&th=1636a9f8278972ff&sml=1632b8a9e14f86af&sml=1632b8e89b68492c&sml](https://mail.google.com/mail/u/0/?ui=2&ik=6cde1142d7&jsver=GAFHaMvshdw.en.&cbl=gmail_fe_180506.06_p7&view=pt&search=inbox&th=1636a9f8278972ff&sml=1632b8a9e14f86af&sml=1632b8e89b68492c&sml)

Wed, May 16, 2018 at 2:16 PM

Go ahead and send me the updated attachments and Cultural Distances and I will swap them out on the 2A. I'd rather keep this 2A moving through our system than push it back and start the review all over.

Oil &amp; Gas Location Assessment Specialist - Northeast Colorado



Wed, May 16, 2018 at 2:23 PM

Let me know if you need anything else – many thanks!



485K