



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 | <http://cogcc.state.co.us/>

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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

C: 720-394-6961

F: 720.420.5800

paul.gottlob@iptenergyservices.com | www.iptenergyservices.com

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

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Friday, May 4, 2018 8:25 AM
To: Paul Gottlob <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

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

Sent: Friday, May 4, 2018 8:29 AM

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

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

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

Fri, May 4, 2018 at 9:06 AM

Paul,

In regards to the MLVT certification, what we prefer to have on the 2A is the MLVT BMP to be modified to include a statement indicating the MLVTs will be designed and implemented consistent with the COGCC Policy on the Use of MLVTs. Let me know if Bayswater is okay with including that statement.

Thanks.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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1120 Lincoln St., Suite 801, Denver, CO 80203
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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 9:08 AM

Doug,

Yes that is OK!

PAUL GOTTLOB

Regulatory & Engineering Technician

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

Sent: Friday, May 4, 2018 9:06 AM

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

Cc: Derek Petrie <derek.petrie@iptenergyservices.com>

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

Wed, May 16, 2018 at 1:39 PM

Doug,

Wed, May 16, 2018 at 2:16 PM

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

Paul,

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.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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

Wed, May 16, 2018 at 2:23 PM

Doug,

Here are the attachments and the cultural distances.

It was just 2 attachments.

Cultural Distances for the Production Facility are on the first page of that attachment.

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

