



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

COGCC Form 2A review of Confluence DJ's Pickaroon South location - Doc #401544376

6 messages

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

Tue, May 15, 2018 at 2:19 PM

To: "Agross@upstreampm.com" <agross@upstreampm.com>, brothe@confluencep.com

Andrea,

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

1) In the Construction section Confluence DJ has indicated the size of the location after interim reclamation will be 6.7 acres. A review of the Proposed Reclamation Map, which was included as part of the Construction Layout Drawings, indicates 6.7 acres will be reclaimed resulting in 6.1 acres after interim reclamation. Please confirm the planned size of the location after interim reclamation.

2) What are Confluence DJ's plan's for gas takeaway from this location. I do not see any gas compressors or sales meters listed in the Facilities section. I do see where several ECDs are listed. Is it Confluence DJ's intention to drill all of these wells at once and burn the gas they produce? This would constitute a waste of the resource and is something we require operators prevent. Noble Energy has a few wells approximately one mile to the southeast in which they are selling the gas so it would seem that a gas pipeline is nearby. Please provide me with an Emission mitigation BMP that discusses Confluence DJ's plans to handle the takeaway of the gas that does not result in waste and what they plan to do if that cannot be accomplished at first sign of salable quality gas.

Please respond to this correspondence by June 15, 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

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Brittany Rothe <brothe@confluencelp.com>

Wed, May 16, 2018 at 10:24 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, "Agross@upstreampm.com" <agross@upstreampm.com>

I am an engineer at Confluence and work closely with Andrea to prepare and submit permits to y'all.

Thank you!

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Tuesday, May 15, 2018 2:19 PM
To: Agross@upstreampm.com; Brittany Rothe <brothe@confluencelp.com>
Subject: COGCC Form 2A review of Confluence DJ's Pickaroon South location - Doc #401544376

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

1) In the Construction section Confluence DJ has indicated the size of the location after interim reclamation will be 6.7 acres. A review of the Proposed Reclamation Map, which was included as part of the Construction Layout Drawings, indicates 6.7 acres will be reclaimed resulting in 6.1 acres after interim reclamation. Please confirm the planned size of the location after interim reclamation. **CONFIRMED – ORIGINAL DISTURBED AREA OF 12.8 ACRES WILL BE RECLAIMED BACK TO 6.1 ACRES (TOTAL OF 6.7 RECLAIMED)**

2) What are Confluence DJ's plan's for gas takeaway from this location. I do not see any gas compressors or sales meters listed in the Facilities section. I do see where several ECDs are listed. Is it Confluence DJ's intention to drill all of these wells at once and burn the gas they produce? This would constitute a waste of the resource and is something we require operators prevent. Noble Energy has a few wells approximately one mile to the southeast in which they are selling the gas so it would seem that a gas pipeline is nearby. Please provide me with an Emission mitigation BMP that discusses Confluence DJ's plans to handle the takeaway of the gas that does not result in waste

Please respond to this correspondence by June 15, 2018. If you have any questions, please contact me. Thank you.

Oil & Gas Location Assessment Specialist - Northeast Colorado



doug.andrews@state.co.us | <http://cogcc.state.co.us/>

Wed, May 16, 2018 at 11:03 AM

Thank you for the quick response. Will Confluence be able to connect to a gas sales line at first sign of salable quality gas? I ask because we have recently been hearing from operators indicating they do not know if a gas sales line will be available or that one may be available sometime (months or a few years) after their wells go online. So they just plan on flaring/burning the gas until such time as one becomes available. This planning (or lack thereof) regarding gas takeaway is problematic for us as this requires pre approval and we are disinclined to grant it.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Brittany Rothe <brothe@confluencep.com>

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

Cc: "Agross@upstreampm.com" <agross@upstreampm.com>

Thu, May 17, 2018 at 9:44 AM

Doug,

Sure thing. Per your question below, Confluence plans to work with a midstream gatherer to have a salable gas pipeline in place prior to any wells being turned on production. We have no plans to flare outside of the normal flaring that occurs during flowback. This will be our stance for all permitting we do in the 7N/8N area.

But I'm happy to comment on each 2A to confirm that for y'all.

Thank you,

Britt

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

Sent: Wednesday, May 16, 2018 11:04 AM

To: Brittany Rothe <brothe@confluencelp.com>

Cc: Agross@upstreampm.com

Subject: Re: COGCC Form 2A review of Confluence DJ's Pickaroon South location - Doc #401544376

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Thu, May 17, 2018 at 3:06 PM

How does Confluence feel about the following Emissions mitigation BMP being placed on your 2As in the 7N/8N area (Pickaroon, Almont-Dotsero, & Dinosaur 31)?

Doug Andrews



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

Thu, May 17, 2018 at 3:15 PM

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Thursday, May 17, 2018 3:07 PM
To: Brittany Rothe <brothe@confluencelp.com>

State.co.us Executive Branch Mail - COGCC Form 2A review of Confluence DJ's Pickaroon South location - Doc #401544376

Subject: Re: COGCC Form 2A review of Confluence DJ's Pickaroon South location - Doc #401544376

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