



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

Mallard Emissions Mitigation BMP & Comment Draft

3 messages

Erin Mathews <emathews@mallardexploration.com>

Mon, May 14, 2018 at 4:40 PM

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

Cc: John Noto - DNR <john.noto@state.co.us>, Ann Feldman <afeldman@ascentgeomatics.com>, Diana Burn - DNR <Diana.Burn@state.co.us>

Doug,

Thanks again for coordinating the meeting last week with staff. As we discussed at the meeting, we are proposing the following language for Mallard's Emission's BMP and are willing to add the following comment to our current Locations in process/on hold and all applicable locations moving forward.

Please review and let me know if this captures what we all discussed last Thursday. We welcome any comments/suggestions/revisions that you or staff may have.

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BMP

Emissions Mitigation: Operator has contracted with a third party to bring a gas sales lines to the location to send salable quality gas immediately down the sales line. In the event that a sales line connection is not available upon the completion of flowback, operator will follow the policy per the Notice to Operators "Rule 912 Venting or Flaring Produced Natural Gas". All salable quality gas shall be directed to the sales line as soon as practicable or shut in and conserved.

Comment to add to Form 2As

Mallard Exploration does not anticipate developing this oil and gas location until the completion of a natural gas gathering system and processing plant that will be constructed in the vicinity of the location by a third party. The gathering system and processing plant are anticipated to be operational during the first quarter of 2019. Mallard has entered into a contract with the operator of the gathering system/plant.

Thanks,

Erin

Erin Mathews, PE

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Erin,

We have reviewed the BMP. We still feel that Rule 805.b.(3) applies to the wells being permitted by Mallard. So we will also include a COA on the 2As directing Mallard to comply with the Green Completions requirements including connecting to a gas sales line or see a variance from this Rule.

Unnecessary or excessive flaring is prohibited. Operator shall direct all salable quality gas to a sales line as soon as practicable or be shut in and conserved per Rule 805.b.(3)B.v. and 912.

***Green Completions** -Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. 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.*

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