

STATE OF
COLORADO

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

COGCC Form 2A review of Edge Energy's Simpson 26 Pad - Doc #401687545

4 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Julie Webb <jwebb@progressivepcs.net>

Wed, Aug 8, 2018 at 2:50 PM

Julie,

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

- 1) As this proposed Oil & Gas Location is within a floodplain, please provide a BMP that addresses the requirements of Rule 603.h.(2)C concerning containment berms around tanks.
- 2) Edge Energy has provided the following BMP: "*Edge will install a 2' berm around the top of the location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas.*" Please revise this BMP to describe this two foot berm (how will it be constructed and maintained, what about where the Access Road enters the location). Also, please describe the types of stormwater controls that will likely be used.
- 3) The Access Road Map indicates that access will come off of Weld County Road 35 and proceed east along the northern edge of the location and turn south at the wells. Comparing this to the Facility Layout Drawing appears to indicate the Access Road will go right through where the MLVT will be placed and through the area to be reclaimed along the northern edge of the location. This does not seem to be well thought out. These drawings need to be revised to better show the Access Road as it enters the location in relation to the MLVT and planned area to be reclaimed.
- 4) This proposed Oil & Gas Location is on irrigated cropland. Therefore, the Reference Area Map & Reference Area Pictures attachments are not required. I would like to remove them from this Form 2A so as to avoid any possible confusion.

Please respond to this correspondence by September 8, 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
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Julie Webb <jwebb@progressivepcs.net>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Sep 6, 2018 at 8:48 AM

Good morning Doug,

The responses are below. Please let me know if you have any additional questions.

Thank you,

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

o: (303) 309-1593

c: (616) 813-5063



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From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Wednesday, August 8, 2018 2:51 PM
To: Julie Webb <jwebb@progressivepcs.net>
Subject: COGCC Form 2A review of Edge Energy's Simpson 26 Pad - Doc #401687545

Julie,

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

1) As this proposed Oil & Gas Location is within a floodplain, please provide a BMP that addresses the requirements of Rule 603.h.(2)C concerning containment berms around tanks.

603.g. Statewide equipment anchoring: Edge will anchor all equipment at drilling and production sites in geological hazard and floodplain areas to the extent necessary to resist flotation, collapse, lateral movement, or subsidence.

603.h All wells will be equipped with remote shut in capabilities accessible from Outside the floodplain in which the wellheads are located.

Edge will install a 2 ft berm around the top of the location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas.

2) Edge Energy has provided the following BMP: "*Edge will install a 2' berm around the top of the location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas.*" Please revise this BMP to describe this two foot berm (how will it be constructed and maintained, what about where the Access Road enters the location). Also, please describe the types of stormwater controls that will likely be used.

Use water bars, and other measures to prevent erosion and non-source pollution. Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Co-locate gas and water gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any pipeline(s).

3) The Access Road Map indicates that access will come off of Weld County Road 35 and proceed east along the northern edge of the location and turn south at the wells. Comparing this to the Facility Layout Drawing appears to indicate the Access Road will go right through where the MLVT will be placed and through the area to be reclaimed along the northern edge of the location. This does not seem to be well thought out. These drawings need to be revised to better show the Access Road as it enters the location in relation to the MLVT and planned area to be reclaimed.

The facility layout drawing has been revised to move the MLVT and show the access road.

4) This proposed Oil & Gas Location is on irrigated cropland. Therefore, the Reference Area Map & Reference Area Pictures attachments are not required. I would like to remove them from this Form 2A so as to avoid any

possible confusion.

The attachments can be removed.

Please respond to this correspondence by September 8, 2018. If you have any questions, please contact me.
Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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SCALED FACILITY_SIMPSON 1-12 PAD (2018-09-05).pdf
214K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Julie Webb <jwebb@progressivepcs.net>

Thu, Sep 6, 2018 at 10:25 AM

Julie,

1) As this proposed Oil & Gas Location is within a floodplain, please provide a BMP that addresses the requirements of Rule 603.h.(2)C concerning containment berms around tanks.

603.g. Statewide equipment anchoring: Edge will anchor all equipment at drilling and production sites in geological hazard and floodplain areas to the extent necessary to resist flotation, collapse, lateral movement, or subsidence.

603.h All wells will be equipped with remote shut in capabilities accessible from Outside the floodplain in which the wellheads are located.

Edge will install a 2 ft berm around the top of the location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas.

These two BMPs were provided on the Form 2A when it was submitted. What I was looking for was a Berm Construction BMP that addresses Rule 603.h.(2)C - **containment berms around all Tanks must be constructed of steel rings or another engineered technology that provides equivalent protection from floodwaters and debris.**

2) Edge Energy has provided the following BMP: "*Edge will install a 2' berm around the top of the location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas.*" Please revise this BMP to describe this two foot berm (how will it be constructed and maintained, what about where the Access Road enters the location). Also, please describe the types of stormwater controls that will likely be used. Use water bars, and other measures to prevent erosion and non-source pollution. Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Co-locate gas and water gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any pipeline(s).

Thank you for the additional information about stormwater controls that will likely be used. However, my request for more information about a proposed 2 foot berm around the top of the location was not included. Will the Access Road go over this 2 foot berm or will this berm not really surround the entire location? What will it be constructed of and how will it be stabilized/maintained? Typically operators only construct containment berms around the tank battery. So berms "*around the top of the location*" is very unusual and I'm curious what Edge Energy really means by this.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Julie Webb <jwebb@progressivepcs.net>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Fri, Sep 7, 2018 at 2:18 PM

Doug,

I've revised the BMP for the floodplain. Please let me know if this will work:

603.g. Statewide equipment anchoring: Edge will anchor all equipment at drilling and production sites in geological hazard and floodplain areas to the extent necessary to resist flotation, collapse, lateral movement, or subsidence.

603.h All wells will be equipped with remote shut in capabilities accessible from Outside the floodplain in which the wellheads are located.

Edge will install a 2 ft berm around the tank batteries on this location to control any runoff from the pad. Stormwater controls will be utilized around any disturbed areas. *Containment berms around all Tanks will be constructed of steel rings or another engineered technology that provides equivalent protection from floodwaters and debris. Edge is working with the county to what type of berm will best suit this location.*

Edge will use water bars, and other measures to prevent erosion and non-source pollution. Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Co-locate gas and water gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any pipeline(s).

The access road does not cross the berms. The berms will only be installed around the tank batteries.

Thanks Doug.

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

o: (303) 309-1593

c: (616) 813-5063



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

Sent: Thursday, September 6, 2018 10:25 AM

9/11/2018

State.co.us Executive Branch Mail - COGCC Form 2A review of Edge Energy's Simpson 26 Pad - Doc #401687545

To: Julie Webb <jwebb@progressivepcs.net>

Subject: Re: COGCC Form 2A review of Edge Energy's Simpson 26 Pad - Doc #401687545

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