

STATE OF
COLORADO

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

COGCC Form 2A review of H&M Petroleum Corporation's State BDB 1 Pad location - Doc #401722983

2 messages

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

Thu, Oct 4, 2018 at 11:18 AM

To: Julie Webb <jwebb@progressivepcs.net>

Julie,

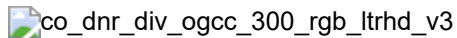
I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) In the Construction section H&M Petroleum has indicated they plan to commence construction on 8/15/18 and begin interim reclamation will begin 2/8/19. Please provide updates to these two dates.
- 2) In the Cultural Setback Distance section H&M Petroleum has listed the exact same distances to cultural features from both the well and the nearest production facility. That means the nearest production facility will be placed directly on top of the wellhead. Obviously this is not going to happen, so these two sets of distance cannot be exactly the same. Furthermore, the Location Drawing shows what I assume to be production facilities located in the opposite corner of the proposed pad. Please review the Cultural Setback Distance section and provide me with revised distances from the nearest production facility.
- 3) During my review it appears the northeast portion of the disturbance area will overlap onto the 98 - Rosebud-Escabosa-Iliff complex, 0-3 percent slopes NRCS Soil Map Unit. Please provide me with this NRCS Map Unit Description and I will add it to the Form 2A.
- 4) A Review of the Reference Area Map and Reference Area Pictures indicates the selected Reference Area used to evaluate pad reclamation will be inside the proposed disturbance area of the pad just a few feet from the wellhead. The Reference Area must be on ground that will be undisturbed by oil & gas operations. Therefore, the selected Reference Area is unacceptable. Please provide a new Reference Area Map & Reference Area Pictures for ground that will be undisturbed by oil & gas operations.
- 5) The Location Drawing indicates the Reserve Pit will be 75'x75'x8'. The Waste Management Plan indicates the Reserve Pit will be 75'x75'x6'. There is an operator comment that indicates the Reserve Pit will be 100'x100'x8'. There must be consistency in describing the size of the proposed Reserve Pit. Please determine the planned size of the Reserve Pit and revise whichever attachments necessary so that every mention of the planned Reserve Pit agree on its dimensions.
- 6) In the Facilities section H&M Petroleum has indicated there will be three tanks (2 oil/1 water), yet there are no emission control devices (e.g. VRU/VOC Combustor/etc.) listed. How will emissions be controlled?

Please respond to this correspondence by November 4, 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
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COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

image003.jpg
5K

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

Tue, Oct 9, 2018 at 8:19 AM

Good morning Doug,

Please see the comments below.

Thank you,

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

o: (303) 309-1593

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

Sent: Thursday, October 4, 2018 11:19 AM

To: Julie Webb <jwebb@progressivepcs.net>

Subject: COGCC Form 2A review of H&M Petroleum Corporation's State BDB 1 Pad location - Doc #401722983

Julie,

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

1) In the Construction section H&M Petroleum has indicated they plan to commence construction on 8/15/18 and begin interim reclamation will begin 2/8/19. Please provide updates to these two dates.

a. [This can be changed to 10/30/2018, 4/30/2019](#)

2) In the Cultural Setback Distance section H&M Petroleum has listed the exact same distances to cultural features from both the well and the nearest production facility. That means the nearest production facility will be placed directly on top of the wellhead. Obviously this is not going to happen, so these two sets of distance cannot be exactly the same. Furthermore, the Location Drawing shows what I assume to be production facilities located in the opposite corner of the proposed pad. Please review the Cultural Setback Distance section and provide me with revised distances from the nearest production facility.

a. Above ground utility 345' , property line 313'.

3) During my review it appears the northeast portion of the disturbance area will overlap onto the 98 - Rosebud-Escabosa-Iliff complex, 0-3 percent slopes NRCS Soil Map Unit. Please provide me with this NRCS Map Unit Description and I will add it to the Form 2A.

a. [NRCS description attached](#)

4) A Review of the Reference Area Map and Reference Area Pictures indicates the selected Reference Area used to evaluate pad reclamation will be inside the proposed disturbance area of the pad just a few feet from the wellhead. The Reference Area must be on ground that will be undisturbed by oil & gas operations.

Therefore, the selected Reference Area is unacceptable. Please provide a new Reference Area Map & Reference Area Pictures for ground that will be undisturbed by oil & gas operations.

a. [Attached are the revised photos and map](#)

5) The Location Drawing indicates the Reserve Pit will be 75'x75'x8'. The Waste Management Plan indicates the Reserve Pit will be 75'x75'x6'. There is an operator comment that indicates the Reserve Pit will be 100'x100'x8'. There must be consistency in describing the size of the proposed Reserve Pit. Please determine the planned size of the Reserve Pit and revise whichever attachments necessary so that every mention of the planned Reserve Pit agree on its dimensions.

a. [I apologize for the typo, the Reserve Pit will be 75'x75'x8'.](#)

6) In the Facilities section H&M Petroleum has indicated there will be three tanks (2 oil/1 water), yet there are no emission control devices (e.g. VRU/VOC Combustor/etc.) listed. How will emissions be controlled?

a. [Emissions will be controlled through the heater treater. Would you please add 1 heater treater to the facility count?](#)

Please respond to this correspondence by November 4, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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3 attachments



20181004_13502301982_82_Map_Unit_Description_Rosebud-Escabosa-Iliff_complex_0_to_3_percent_slopes--Logan_County_Colorado.pdf
131K



STATE BDB #1 Well REFERENCE AREA 2018-10-04.pdf
387K



Reference area Photos.pdf
1391K