



STATE OF
COLORADO

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

COGCC Form 2A review of Nickel Road Operating's ELDER PAD location - Doc #401548407

4 messages

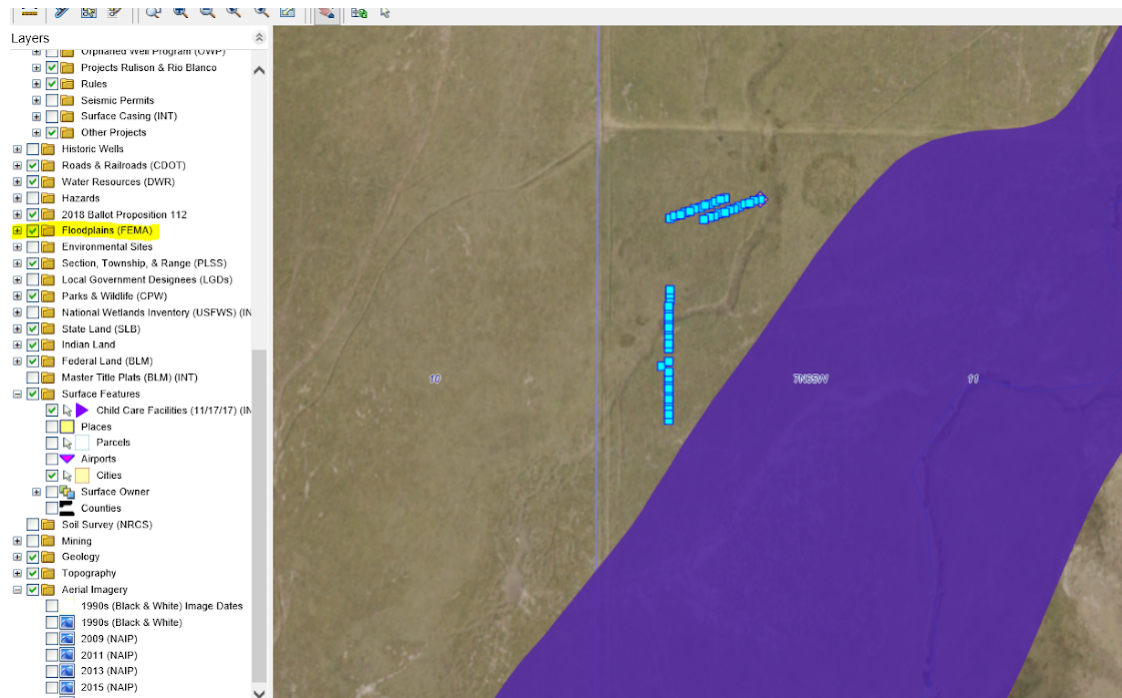
Andrews - DNR, Doug <doug.andrews@state.co.us>
To: jennifer.lind@nickelroadoperating.com

Mon, Oct 29, 2018 at 10:32 AM

Jennifer,

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


- 1) Nickel Road has indicated the Land Use for this proposed Oil & Gas Location is Rangeland. When that is the case, the operator is required to include a Reference Area Map & Reference Area Pictures attachment on the Form 2A. Neither of these were included. Please send me these two attachments.
- 2) Nickel Road has included a letter certifying Rule 305.a. (pre-Application notices) was met. This attachment is only required when there are Building Units within 1,000 feet. As there are no Building Units within 1,000 feet, I would like to remove this attachment.
- 3) Per the COGCC Policy on the Use of MLVTs, please provide me with the size/volume of MLVTs that will be used on this proposed Oil & Gas Location.
- 4) In the Water Resources section, Nickel Road has indicated this location is not within a floodplain. During my review it appears the production facilities and MLVTs that are south and southwest of the north/south line of wells will lie within a mapped floodplain (see the attached screenshot). If any portion of the proposed Oil & Gas Location lies within a floodplain the operator should indicate YES on the Form 2A and the requirements of COGCC Rule 603.h. apply. If you concur with my findings, please provide BMPs that address the following requirements:
 - 603.h.(1)B - Remote shut-in capabilities of the wells
 - 603.h.(1)C - Secondary containment around tanks
 - 603.h.(2)B - Anchoring of tanks and separation equipment
 - 603.h.(2)C - Steel ring containment berms



Please respond to this correspondence by November 29, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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303.894.2100 Ext. 5180

1120 Lincoln St., Suite 801, Denver, CO 80203

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



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

image003.jpg
5K

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Oct 30, 2018 at 4:13 PM

Doug, below in blue, please find NRO's response to each of the items requesting clarification.

Thank you,

Jennifer

303-406-1117

jennifer.lind@nickelroadoperating.com



Learn more at www.protectcolorado.com

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

Sent: Monday, October 29, 2018 10:33 AM

To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Subject: COGCC Form 2A review of Nickel Road Operating's ELDER PAD location - Doc #401548407

Jennifer,

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

1) Nickel Road has indicated the Land Use for this proposed Oil & Gas Location is Rangeland. When that is the case, the operator is required to include a Reference Area Map & Reference Area Pictures attachment on the Form

2A. Neither of these were included. Please send me these two attachments.

Reference area map and photos will be provided via Sundry during the 2019 growing season (anticipated by 4/15/19 – 5/1/19).

2) Nickel Road has included a letter certifying Rule 305.a. (pre-Application notices) was met. This attachment is only required when there are Building Units within 1,000 feet. As there are no Building Units within 1,000 feet, I would like to remove this attachment.

Please remove this attachment.

3) Per the COGCC Policy on the Use of MLVTs, please provide me with the size/volume of MLVTs that will be used on this proposed Oil & Gas Location.

Large MLVT Size/volume - 188' diameter/60,000 bbl

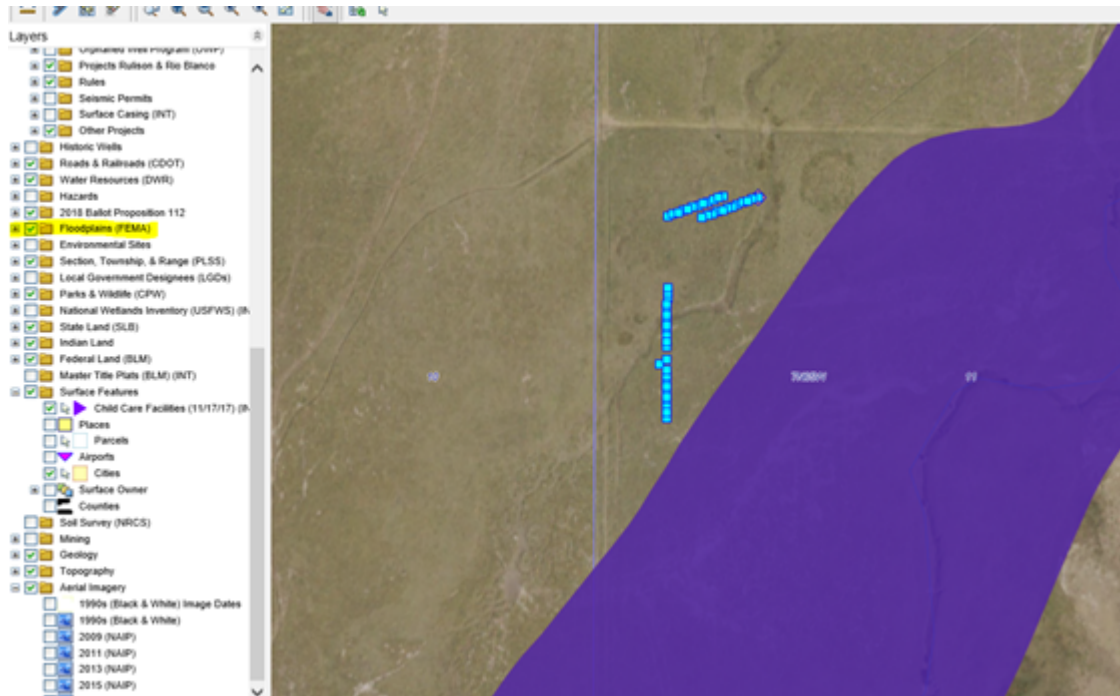
4) In the Water Resources section, Nickel Road has indicated this location is not within a floodplain. During my review it appears the production facilities and MLVTs that are south and southwest of the north/south line of wells will lie within a mapped floodplain (see the attached screenshot). If any portion of the proposed Oil & Gas Location lies within a floodplain the operator should indicate YES on the Form 2A and the requirements of COGCC Rule 603.h. apply. If you concur with my findings, please provide BMPs that address the following requirements:

603.h.(1)B - Remote shut-in capabilities of the wells

603.h.(1)C - Secondary containment around tanks

603.h.(2)B - Anchoring of tanks and separation equipment

603.h.(2)C - Steel ring containment berms



Please add the following floodplain BMPs:

- **603.h.(1)B** - The wells located on this pad will be equipped with remote shut-in capabilities prior to commencing production. Remote shut-in capabilities include the ability to shut-in the well from outside the relevant Floodplain via automation controls.
- **603.h.(1)C & 603.h.(2)C** - Secondary containment around tanks will be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. All berms will be visually checked periodically to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material.
- **603.h.(2)B** - All oil and produced water tanks and separation equipment will be anchored to the ground. Anchors will be engineered to support the tanks and separation equipment and

to resist flotation, collapse, lateral movement, or subsidence.

Please respond to this correspondence by November 29, 2018. If you have any questions, please contact me.
Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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1120 Lincoln St., Suite 801, Denver, CO 80203

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

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: jennifer.lind@nickelroadoperating.com

Thu, Nov 1, 2018 at 8:33 AM

Jennifer,

Only the Reference Area Pictures attachment can be submitted via Sundry within 12 months of the Form 2A. The Reference Area Map attachment must be included on the Form 2A. Please send me a Reference Area Map for this proposed Oil & Gas Location. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado


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9 attachments **image003.png**
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Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Nov 1, 2018 at 9:20 AM

Doug, please see attached Reference Area Map. We will be sure to get out there first thing this spring to grab the photos. Please let me know if you have any questions or need anything additional.

Happy November!

Thank you!

Jennifer

303-406-1117

jennifer.lind@nickelroadoperating.com



Learn more at www.protectcolorado.com

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

Sent: Thursday, November 1, 2018 8:34 AM

To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Subject: Re: COGCC Form 2A review of Nickel Road Operating's ELDER PAD location - Doc #401548407

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11/1/2018

State.co.us Executive Branch Mail - COGCC Form 2A review of Nickel Road Operating's ELDER PAD location - Doc #401548407

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303.894.2100 Ext. 5180

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Elder Pad_Ref Area Map.pdf

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