

STATE OF  
COLORADO

Treitz - DNR, Rebecca &lt;rebecca.treitz@state.co.us&gt;

---

**Blue Paintbrush Facility 2A doc no 401704857**

8 messages

---

**Treitz - DNR, Rebecca** <rebecca.treitz@state.co.us>  
To: Kelsi Welch <kwelch@extractionog.com>

Fri, Nov 2, 2018 at 1:09 PM

Kelsi,

Kelsi,

COGCC is reviewing the Form 2A for the Blue Paintbrush Facility (doc no 401704857). In order to complete our review, please address the following:

1. The facilities list does not match the Facility layout drawing. Please confirm the equipment that will be at the location. What are the drain pits on the Facility Layout drawing?
2. Under the drilling program, this is a production only location, unless cuttings or completions will occur on this location, with your concurrence, I will changed closed loop system and OBM to "no" and make a comment drilling waste will not be produced or stored this location.
3. The nearest well is correct, but is not in the shallowest aquifer. There are several monitoring wells approximately 2700 feet north with a depth of 15 feet to ground water. With your concurrence, I will change the depth of water to 15 feet.
4. Under the BMP section, please clarify:
  - a. The stormwater BMP (#12) references the CDPHE permit, with your concurrence, I will move the sentence to the comments section.
  - b. For lighting, please clarify the "where possible" under BMP #16
  - c. Please describe the site specific noise mitigation for this location as it is a production location for both during construction (i.e. will be during daylight hours?) and for long term during production
  - d. BMP #21 references OBM. Please provide odor BMP for a production location
  - e. BMP #22 is for downhole and does not relate to the production location, with your concurrence, I will remove the BMP
5. Please provide a 306.e. certification for the location after Extraction has communicated with all parties that requested a conulation.

Please let me know if you have question or would like to discuss any of the above further.

Thank you,

Rebecca

--

Rebecca Treitz  
Oil and Gas Location Assessment Specialist  
P 303.894.2100 x5173 | F 303.894.2109 |  
1120 Lincoln Street, Suite 801, Denver, CO 80203  
[Rebecca.Treitz@state.co.us](mailto:Rebecca.Treitz@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

---

**Kelsi Welch** <kwelch@extractionog.com>  
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Thu, Nov 29, 2018 at 1:20 PM

Hi Rebecca!

I apologize for my delayed response- getting all these answers took me a while. Please see my responses below in red and let me know if you need anything additional.

Thank you!

Kelsi

---

**From:** Treitz - DNR, Rebecca <[rebecca.treitz@state.co.us](mailto:rebecca.treitz@state.co.us)>  
**Sent:** Friday, November 2, 2018 1:10 PM  
**To:** Kelsi Welch <[kwelch@extractionog.com](mailto:kwelch@extractionog.com)>  
**Subject:** Blue Paintbrush Facility 2A doc no 401704857

Kelsi,

Kelsi,

COGCC is reviewing the Form 2A for the Blue Paintbrush Facility (doc no 401704857). In order to complete our review, please address the following:

1. The facilities list does not match the Facility layout drawing. Please confirm the equipment that will be at the location. What are the drain pits on the Facility Layout drawing? **Please use the following equipment counts:**
  - Oil Tanks: 8
  - Water Tanks: 2
  - MLVTs: 2
  - Separators: 34
  - Gas Compressors: 7
  - LACT Units: 2
  - VRUs: 2
  - VOC: 4
  - Maintenance Tank: 1
  - Sales Meter: 1
  - O2 Meter: 1
2. Under the drilling program, this is a production only location, unless cuttings or completions will occur on this location, with your concurrence, I will changed closed loop system and OBM to "no" and make a comment drilling waste will not be produced or stored this location. **Please go ahead and make this change.**
3. The nearest well is correct, but is not in the shallowest aquifer. There are several monitoring wells approximately 2700 feet north with a depth of 15 feet to ground water. With your concurrence, I will change the depth of water to 15 feet. **Please go ahead and make the change.**
4. Under the BMP section, please clarify:
  - a. The stormwater BMP (#12) references the CDPHE permit, with your concurrence, I will move the sentence to the comments section. **Please go ahead and move to the comments section.**
  - b. For lighting, please clarify the "where possible" under BMP #16 **I think the wording of this BMP is just poor – can you please replace with the following: *Permanent lighting will be installed around the facility to allow both the operator and haulers to conduct safe operations at night. To the extent practicable, site lighting shall be directed downward and inward and shielded so as to avoid glare on public roads and Building Units.***

- c. Please describe the site specific noise mitigation for this location as it is a production location for both during construction (i.e. will be during daylight hours?) and for long term during production **Please use the following BMP: Noise levels will be assessed as necessary to maintain compliance with Rule 802. and 604.c.(2).A. The current mitigation plan is to install sounds walls that will cover 480' of the western parameter, 340' of the northern parameter, 320' of the eastern parameter and 320' of the southern parameter.**
- d. BMP #21 references OBM. Please provide odor BMP for a production location **Please replace with the following: 805. Oil & gas facilities and equipment shall be operated in such a manner that odors do not constitute a nuisance or hazard to public welfare.**
- e. BMP #22 is for downhole and does not relate to the production location, with your concurrence, I will remove the BMP **Please go ahead and remove**
5. Please provide a 306.e. certification for the location after Extraction has communicated with all parties that requested a consultation. **Please see attached.**

Please let me know if you have question or would like to discuss any of the above further.

Thank you,

Rebecca

--

Rebecca Treitz

Oil and Gas Location Assessment Specialist

P 303.894.2100 x5173 | F 303.894.2109 |

1120 Lincoln Street, Suite 801, Denver, CO 80203

[Rebecca.Treitz@state.co.us](mailto:Rebecca.Treitz@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

---

 **BPB Facility Pad\_306 e Certification Letter to The Director.pdf**  
118K

---

**Treitz - DNR, Rebecca** <[rebecca.treitz@state.co.us](mailto:rebecca.treitz@state.co.us)>  
To: Kelsi Welch <[kwelch@extractionog.com](mailto:kwelch@extractionog.com)>

Wed, Dec 5, 2018 at 4:58 PM

Kelsi,  
Thank you for the information. The Facility Layout drawing has:  
Knockout - 1  
ECD - 2  
Drain Pit - 2  
Production Drain Pit - 1

Should these not be on the drawing or should they be added to the Facility list?

For the noise BMP, as drilling will not be occurring on this location, will construction be during daylight hours or 24 hours a day? I am assuming the sound walls are for completion activities which are noisy and happen 24 hours? I noticed the sound walls have the same length of the drill location, but the two locations are different disturbed area sizes. Is this the correct BMP for this location or should the other one be revised?

The 306.e. certification states there were not any requests for a meeting. The meetings with the Holley's was only for the drill pad or both locations?

Thanks,

Rebecca

[Quoted text hidden]

---

**Kelsi Welch** <kwelch@extractionog.com>  
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Mon, Dec 10, 2018 at 10:17 AM

Hi Rebecca,

I did not realize those components needed to be included in the equipment list on the 2A - please go ahead and add them, the facility layout drawing is correct.

For the noise BMP- construction is planned for daylight hours only, but I did get my locations switched around so sorry about that! The BMP listed in the previous email is for the well pad, please use the following for the Facility pad BMP:

*Noise levels will be assessed as necessary to maintain compliance with COGCC Rules 604.c.(2).A. and 802. Construction activity will take place during daylight hours only. Should noise levels exceed the maximum permissible levels for Light Industrial Zones as measured at the nearest Building Unit per COGCC Rules 604.c.(2).A. & 802, additional mitigation measures will be considered and implemented where necessary to maintain compliance. Examples of mitigation measures may include sound walls, landscaping and/or haybales.*

The Holly's are not within 1000' of the facility pad, only of the well pad, so their consultation does not apply to this location.

Thank you!

Kelsi

---

**From:** Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>  
**Sent:** Wednesday, December 5, 2018 4:58 PM  
**To:** Kelsi Welch <kwelch@extractionog.com>  
**Subject:** Re: Blue Paintbrush Facility 2A doc no 401704857

[Quoted text hidden]

---

**Treitz - DNR, Rebecca** <rebecca.treitz@state.co.us>  
To: Kelsi Welch <kwelch@extractionog.com>

Fri, Dec 14, 2018 at 1:41 PM

Thanks Kelsi,  
Is the building unit owner to the south a neighboring building unit or the property owner? If not has there been communication with this building unit owner? I wasn't sure if Pleasant View Farm and Rinn Valley were the same.

Rebecca

[Quoted text hidden]

**Treitz - DNR, Rebecca** <rebecca.treitz@state.co.us>  
To: Kelsi Welch <kwelch@extractionog.com>

Fri, Dec 14, 2018 at 1:48 PM

Kelsi,  
Sorry, looking at the BMPs, with your concurrence, as this is production only, I will remove the following:

1. BMP #3 - Flammable liquids within 50 feet of a wellbore;
2. BMP #21 regarding OBM; and
3. #22 Backup stabbing valves.

Thank you,  
Rebecca

[Quoted text hidden]

---

**Kelsi Welch** <kwelch@extractionog.com>  
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Fri, Dec 14, 2018 at 3:00 PM

Hi Rebecca!

The building owners to the south are not the surface owners. There has been extensive communication with the owners – they are mineral owners in this pad as well as our other Rinn Valley Pads and they were consulted in the design of this location.

Please let me know if you need anything additional!

Thank you!

Kelsi

---

**From:** Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>  
**Sent:** Friday, December 14, 2018 1:42 PM  
**To:** Kelsi Welch <kwelch@extractionog.com>

[Quoted text hidden]

[Quoted text hidden]

---

**Kelsi Welch** <kwelch@extractionog.com>  
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Fri, Dec 14, 2018 at 3:01 PM

Hi Rebecca,

That is fine with me- please go ahead and remove.

Thank you and have a great weekend!

Kelsi

**From:** Treitz - DNR, Rebecca <[rebecca.treitz@state.co.us](mailto:rebecca.treitz@state.co.us)>

**Sent:** Friday, December 14, 2018 1:49 PM

**To:** Kelsi Welch <[kwelch@extractionog.com](mailto:kwelch@extractionog.com)>

[Quoted text hidden]

[Quoted text hidden]