

FORM
2A

Rev
08/13

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401331835

Date Received:

07/12/2017

Oil and Gas Location Assessment

☒ New Location ☐ Refile ☐ Amend Existing Location Location#: _____

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

460375

Expiration Date:

12/27/2021

☐ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # _____
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10110
Name: GREAT WESTERN OPERATING COMPANY LLC
Address: 1001 17TH STREET #2000
City: DENVER State: CO Zip: 80202

Contact Information

Name: Natalie Svendsen
Phone: (303) 398-0394
Fax: ()
email: nsvendsen@gwogco.com

RECLAMATION FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID: 20160041 ☐ Gas Facility Surety ID: _____
☐ Waste Management Surety ID: _____

LOCATION IDENTIFICATION

Name: Baseline LE Pad Number: _____
County: ADAMS
QuarterQuarter: NENE Section: 2 Township: 1S Range: 67W Meridian: 6 Ground Elevation: 5009
Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.
Footage at surface: 623 feet FNL from North or South section line
1423 feet FEL from East or West section line
Latitude: 39.998672 Longitude: -104.851658
PDOP Reading: 1.4 Date of Measurement: 01/31/2017
Instrument Operator's Name: Jared Christopher

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:

LOCATION ID #

FORM 2A DOC #

FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	30	Oil Tanks*	32	Condensate Tanks*		Water Tanks*	8	Buried Produced Water Vaults*	
Drilling Pits		Production Pits*		Special Purpose Pits		Multi-Well Pits*		Modular Large Volume Tanks	2
Pump Jacks		Separators*	26	Injection Pumps*		Cavity Pumps*		Gas Compressors*	3
Gas or Diesel Motors*		Electric Motors		Electric Generators*		Fuel Tanks*		LACT Unit*	
Dehydrator Units*		Vapor Recovery Unit*	3	VOC Combustor*		Flare*		Pigging Station*	

OTHER FACILITIES*

Other Facility Type

Number

Gas Scrubbers	7
Treaters	5
Sales Compressor	3
FWKO	1
ECD	12
Sales Meter	2

Those facilities indicated by an asterisk () shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

(30) 2" Steel Flowlines
(5) 4" Steel Oil Lines
(2) 6" Poly Water Lines
(1) 4" Poly Water Line
(3) 6" Steel Gas Lines
(3) 4" Steel Gas Lines

CONSTRUCTION

Date planned to commence construction: 02/01/2019

Size of disturbed area during construction in acres: 15.56

Estimated date that interim reclamation will begin: 02/01/2021

Size of location after interim reclamation in acres: 5.24

Estimated post-construction ground elevation: 5008

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H₂S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE

Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: _____

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Baseline Lakes Holdings

Phone: _____

Address: 12460 1st Street

Fax: _____

Address: _____

Email: _____

City: Eastlake State: CO Zip: 80614

Surface Owner: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check all that apply. The Surface Owner: ☐ is the mineral owner

☐ is committed to an oil and Gas Lease

☐ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: _____ Surface Surety ID: _____

Date of Rule 306 surface owner consultation _____

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☐ Dry land ☒ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): _____

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Future Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☐ Dry land ☒ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): _____

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	755 Feet	591 Feet
Building Unit:	755 Feet	825 Feet
High Occupancy Building Unit:	3834 Feet	3741 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	610 Feet	517 Feet
Above Ground Utility:	593 Feet	500 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	185 Feet	1 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- ☒ Buffer Zone
- ☐ Exception Zone
- ☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.
- Large UMA Facility - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 06/07/2017

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- ☒ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- ☒ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

GWOC has reviewed the surrounding areas within the vicinity of the proposed Location and has chosen this Location based on the following assessment. The facilities have been placed to the east of the drilling pad, placing it furthest away from the existing residential development located to the west of the proposed Location and closer to the existing industrial and agricultural facilities and well locations to the east and surrounding the pad. The pad is unable to move further east due to the irrigation canal and ponds located east of the pad. Rotating the production pad to the north would put it closer to the nearest building unit located to the north of the pad and potentially placing it within an Exception Zone. Furthermore, this location was chosen to accommodate the planned/platted future development plans of the surface owner, to the west, south and southeast. If the pad location was to be switched with the BHL the new pad would be placed in a LUMA.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: Platner loam, 0 to 3 percent slopes.

NRCS Map Unit Name:

NRCS Map Unit Name:

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☒

Plant species from: ☐ NRCS or, ☐ field observation Date of observation: _____

List individual species: _____

Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- ☐ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- ☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- ☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- ☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- ☐ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- ☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- ☐ Alpine (above timberline)
- ☐ Other (describe): _____

WATER RESOURCES

Is this a sensitive area: ☐ No ☒ Yes

Distance to nearest

downgradient surface water feature: 18 Feet

water well: 1200 Feet

Estimated depth to ground water at Oil and Gas Location 6 Feet

Basis for depth to groundwater and sensitive area determination:

Reciept # 9059068, Permit # 3690-F-

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer _____ No
zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

Is the Location within a Floodplain? ☒ No ☐ Yes Floodplain Data Sources Reviewed (check all that apply)

☒ Federal (FEMA)

☐ State

☐ County

☐ Local

☐ Other _____

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A _____

WILDLIFE

- ☐ This location is included in a Wildlife Mitigation Plan
- ☐ This location was subject to a pre-consultation meeting with CPW held on _____

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

- ☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments

The Baseline 06-149HN well was used as the reference well for footages, cultural distances and latitude/longitude under the Location Identification tab.

MLVT manufacturer is Brewer Steel Company, the MLVT is 60,000 BBL in size. The anticipated time frame the MLVTs will be on location is approximately 3 weeks, please see the construction layout exhibit attached for placement of the MLVTs.

The attached SUA was obtained from Extraction and now belongs to Great Western. An additional map has been attached labelled as "other" to further describe the location stated in the SUA.

Storm Water Management Plans (SWMP) are in place to address construction, drilling and operations associated with Oil and Gas development throughout the state of Colorado in accordance with Colorado Department of Public Health and Environment (CDPHE).

Spill Prevention Control and Countermeasures (SPCC) plans in place to address any possible spills associated with Oil and Gas operations throughout the state of Colorado in accordance with CFR 112.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: 07/12/2017 Email: regulatorypermitting@gwogco.com

Print Name: Ashley Noonan Title: Sr. Regulatory Analyst

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: _____ Director of COGCC Date: 12/28/2018

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type

Description

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Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Planning	<p>*MLVT Certification Statement: Great Western Operating Company certifies that the MLVTs on this location will be designed and implemented consistent with the COGCC Policy on the use of MLVTs in the state of Colorado.</p>
2	Planning	<p>Multi-well Pads - Rule 604.c.(2)E. This is a multi-well pad. GWOC utilizes multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. The pad has all weather access roads to allow for operator and emergency response.</p>
3	Planning	<p>Pit level indicators - Rule 604.c.(2)K GWOC does not typically utilize pits in any of its operations. No pits will be used for this facility.</p>
4	Planning	<p>Fencing requirements - Rule 604.c.(2)M At a minimum GWOC installs appropriate fencing to restrict access by any unauthorized persons. This fencing may vary depending on site-specific situations, such as reasonable security, local government or surface owner concerns. Fencing will be properly noted on facility layout diagrams for both drilling/completion and the production phases of operations.</p>
5	Planning	<p>Load lines - Rule 604.c.(2)O In any designated setback zone all load lines are capped or bull-plugged or locked shut to reduce the likelihood of a release occurring. In addition, GWOC places all load line receivers/valves inside secondary containment areas or in a proper load line containment device or both.</p>
6	Planning	<p>Access Roads - Rule 604.c.(2)S All access roads are designed, constructed, and maintained such that heavy equipment, including emergency response vehicles, can readily access and exit the location. The pad has all weather access roads to allow for operator and emergency response. In addition, GWOC will implement manual mud mitigation measures (eg. tracking control rock aprons) at location exits onto paved roads as necessary and in conjunction with county requirements.</p>
7	Planning	<p>Identification of P&A wells - Rule 604.c.(2)U GWOC shall identify the location of the P&A wellbore with a permanent monument as specified in Rule 319.a.(5). The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument. P&A wellbores shall be cutoff well below ground surface in agricultural areas to provide for landowners to safely farm the reclaimed well area.</p>
8	Planning	<p>Development from existing well pads - Rule 604.c.(2)V Where possible, GWOC shall provide for the development of multiple reservoirs by drilling on existing pads. GWOC strives to utilize multi-well pads wherever technically and economically practicable to minimize potential impacts to neighbors and the environment. Multi-well pads are not always feasible due to numerous possible issues including but not limited to; landowner requirements, topographic constraints, well bore reaches, setback requirements, etc.</p>

9	Traffic control	<p>Traffic Plan - Rule 604.c.(2)D.</p> <p>An access route from the highway or county road to the proposed oil and gas location has been prearranged. Required access road permits will be obtained before construction begins and any special requirements outlined by the municipality will be followed. Emergency routes will be chosen prior to the commencement of operations and will be clearly marked and maintained throughout drilling, completion and production activities.</p>
10	General Housekeeping	<p>General Housekeeping:</p> <p>General housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur cleanup will be implemented within 24-48 hours, as appropriate, to minimize any commingling of waste materials with storm water runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup will consist of patrolling the roadways, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.</p>
11	General Housekeeping	<p>Removal of Surface Trash - Rule 604.c.(2)P</p> <p>All surface debris, trash, unusable scrap, or solid waste from the facility will be properly temporarily stored on location in a secure container and ultimately removed and disposed of in a legal manner.</p>
12	General Housekeeping	<p>Guy line anchors - Rule 604.c.(2)Q</p> <p>Guy line anchors left buried for future use shall be identified by a brightly colored marker at least 4-feet in height and within 1-foot to the east of the anchor.</p>
13	General Housekeeping	<p>Well site cleared - Rule 604.c.(2)T</p> <p>Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.</p>
14	Storm Water/Erosion Control	<p>Storm Water Management Plans (SWMP)</p> <p>Storm water controls will be constructed around the perimeter of the site prior to construction. Typically, GWOC utilizes a ditch and berm system of storm water control at its sites. BMP's used are determined just prior to construction by a third party storm water contractor and may vary according to the location. Storm water controls will remain in place until the pad is stabilized or reaches final reclamation.</p>
15	Storm Water/Erosion Control	<p>Berm Construction - Rule 604.c.(2)G.</p> <p>A minimum containment capacity of 150% of the single largest storage vessel inside the containment will be constructed around any liquids storage area within a designated setback zone. For this location, steel containment with sealed liners will be utilized at all storage facilities on this location.</p> <p>Tanks and all visible pipelines and valves etc. will be inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures.</p>

16	Material Handling and Spill Prevention	<p>Material Handling and Spill Prevention</p> <p>In accordance with COGCC Rule 1002.f.(2)A. & B., shall provide a designated storage area for dry bulk chemicals and miscellaneous fluids. The dry chemicals in the storage area shall be adequately protected to prevent contact with precipitation, shall be elevated above storm- or standing water, and shall provide sufficient containment for liquid chemical storage to prevent release of spilled fluids from impacting soil, surface water or groundwater and will prevent the co-mingling of spilled fluids or chemicals with other E&P Waste.</p>
17	Material Handling and Spill Prevention	<p>Leak Detection Plan - Rule 604.c.(2)F.</p> <p>GWOC designs its new facilities to both avoid leaks or releases as well as to help detect them in a time-efficient manner to minimize potential impacts. Tanks and all visible pipelines and valves etc. are inspected informally on a daily basis by company lease operators. In addition, GWOC also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures. In addition, our company lease operators and Production staff review production records, including volumes and pressures, looking for irregularities that may indicate a problem with a tank or pipeline. If an irregularity is detected that may indicate a potential release the suspect tank and/or pipeline(s) are removed from service, isolated, and either pressure tested or visibly inspected for indications of a potential leak.</p>
18	Material Handling and Spill Prevention	<p>Control of Fire Hazards - Rule 604.c.(2)N</p> <p>GWOC constructs and operates our facilities to meet state and API codes, as appropriate, including API RP 500 electrical classifications inside bermed areas. Any unused potentially flammable materials are moved a minimum distance of 25-feet from wellhead, tanks, and separator areas. In addition, GWOC implements a Hot Work Permit Program for employees and contractors doing any defined 'Hot Work' activities on GWOC locations.</p>
19	Material Handling and Spill Prevention	<p>Tank specifications - Rule 604.c.(2)R</p> <p>All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). GWOC shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director. Only the 2008 version of NFPA Code 30 applies to this rule.</p>
20	Dust control	<p>Dust Control</p> <p>Dust control measures may include surface stabilization, or dust control with appropriate chemical or later applications.</p>
21	Noise mitigation	<p>Sound and Light Mitigation</p> <p>During the drilling and completions phase, Great Western plans to construct sound/visual walls that will be placed along the edges of the pad. This will also assist to block out any lighting from nearby occupied structures. This pad will be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping.</p> <p>Light sources will be directed downwards, and away from occupied structures where possible. Once the drilling and completion rigs leave the site, there will be no permanently installed lighting on site.</p>
22	Noise mitigation	<p>Noise - Rule 604.c.(2)A.</p> <p>Great Western Operating Company, L.L.C. (GWOC) will operate in accordance with permissible noise levels per COGCC Rule 604.c.(2)A. and 802, as applicable. Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist with noise mitigation. These practices will be implanted upon initiation of drilling and production.</p>

23	Emissions mitigation	Green Completions (Rule 604.c.(2)C. 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.
24	Odor mitigation	Odors Mitigation: Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist in mitigating potential odors. Sealed tanks with pressure relief valves and emissions controls will be utilized for the production phase. Great Western will be using a synthetic oil based drilling fluid called D822. Based upon laboratory analysis, the D822 contains lower levels of VOC and aromatics when compared to diesel. This will be used during the drilling phase in order to minimize any possible odors emitting from the site.
25	Drilling/Completion Operations	Drill stem tests - Rule 604.c.(2)L. Closed chamber drill stem tests shall be allowed. All other drill stem tests shall require approval by the Director.
26	Drilling/Completion Operations	BOPE for well servicing - Rule 604.c.(2)J A BOPE with a minimum pressure rating of 3,000 psi will be utilized. At a minimum it will consist of 2 ram preventers and 1 annular preventer. The blind rams will be positioned below the pipe rams. A backup system of pressure control will be onsite consisting of at a minimum 1,000 psi accumulator (backup pressure). Accumulator is tested to 1,000 psi. Operator may use fixed sized pipe rams matching the tubular size. The annular preventer will be pressure tested to 250 psi low and 2,000 psi high for 10 minutes each. The ram preventers will be tested to 250 psi low and 2,500 psi high for 10 minutes each. All remaining well control equipment will be tested to 250 psi low and 2,500 psi high for 10 minutes each. The pressure tests will be conducted when the equipment is first installed and every 30 days thereafter. Pipe rams and blind rams will be function tested before every well service operation. Annual BOP inspections and pressure tests will be performed by the service company and will be charted & retained for 1 year. Backup stabbing valves shall be used on operations that require reverse circulation. Valves will be pressure tested before each well service operation in low pressure and high pressure range. The GWOC onsite representative will be certified in Well Control Operations by a Well-Cap certified training service.
27	Drilling/Completion Operations	Closed Loop Drilling – Pit Restrictions Rule 604.c.(2)B. Great Western Operating Company, LLC (GWOC) will be utilizing a closed loop drilling system.

Total: 27 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
1010369	RULE 306.E. CERTIFICATION
401331835	FORM 2A SUBMITTED
401332890	NRCS MAP UNIT DESC
401332891	ACCESS ROAD MAP
401332892	CONST. LAYOUT DRAWINGS
401332893	FACILITY LAYOUT DRAWING
401332894	HYDROLOGY MAP
401332895	LOCATION DRAWING
401332896	LOCATION PICTURES
401332897	MULTI-WELL PLAN
401332900	WASTE MANAGEMENT PLAN
401350517	SURFACE AGRMT/SURETY
401350518	OTHER
401351450	PRE-APPLICATION NOTIFICATION CERTIFICATION

Total Attach: 14 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	<p>Updated all Related Forms with new doc #s, as original APDs were withdrawn and replaced with new forms.</p> <p>Changed production facility distance to nearest property line from "0" to "1" as eForms system would not allow a value of 0.</p> <p>Permitting review complete.</p> <p>Final review complete.</p>	12/26/2018
OGLA	<p>Updated Green Completions BMP.</p> <p>Verified that the MLVT Manufacturer is correct still.</p>	09/07/2018
OGLA	<p>Prioritizing the OCHO and Brandt Locations.</p> <p>GWOC is planning a Neighborhood Meeting later this year and will provide feedback.</p> <p>ON HOLD for Form 2 Revisions.</p> <p>Awaiting new revisions to the Cultural Distances.</p> <p>Revisions to Cultural Distance received. 06/01/2018</p> <ul style="list-style-type: none"> - Cultural Distance to the nearest Building from the production is still incorrect. If measured from the Water Tank, the nearest Building is approximately 590 feet to the farm building (Building). Cultural Distance from the production facility to the nearest property line is incorrect and should be 0 feet from the Free Water Knockout. Distance from the nearest Well to the property is incorrect and appears to be approximately 185 feet. Please verify. - Per Operator request, updated the Cultural Distances to "Nearest Building to the Production Facility to 591 feet, the "Nearest Property Line from the Production Facility (Free Water Knock Out) to 0 feet, and changed the distance from the "Nearest Property Line to the Well to 185 feet." - 09/12/2018 <p>Next on the Priority List. Pushed to IN PROCESS.</p>	02/28/2018

OGLA	<p>Per Operator request, revised the siting rationale to the following.</p> <p>"GWOC has reviewed the surrounding areas within the vicinity of the proposed Location and has chosen this Location based on the following assessment. The facilities have been placed to the east of the drilling pad, placing it furthest away from the existing residential development located to the west of the proposed Location and closer to the existing industrial and agricultural facilities and well locations to the east and surrounding the pad. The pad is unable to move further east due to the irrigation canal and ponds located east of the pad. Rotating the production pad to the north would put it closer to the nearest building unit located to the north of the pad and potentially placing it within an Exception Zone. Furthermore, this location was chosen to accommodate the planned/platted future development plans of the surface owner, to the west, south and southeast. If the pad location was to be switched with the BHL the new pad would be placed in a LUMA."</p>	01/05/2018
OGLA	<p>BMP needs to be revised:</p> <p>Control of Fire Hazards - Rule 604.c.(2)N GWOC constructs and operates our facilities to meet state and API codes, as appropriate, including API RP 500 electrical classifications inside bermed areas. Any unused potentially flammable materials are moved a minimum distance of 25-feet from wellhead, tanks, and separator areas. In addition, GWOC implements a Hot Work Permit Program for employees and contractors doing any defined 'Hot Work' activities on GWOC locations.</p> <p>Added Modified Green Completions BMP. Added Rule 604.c.(2)L BMP.</p> <p>Moved the following to the Submit Tab as these are not enforceable by COGCC Rules. Storm Water Management Plans (SWMP) are in place to address construction, drilling and operations associated with Oil and Gas development throughout the state of Colorado in accordance with Colorado Department of Public Health and Environment (CDPHE).</p> <p>Spill Prevention Control and Countermeasures (SPCC) plans in place to address any possible spills associated with Oil and Gas operations throughout the state of Colorado in accordance with CFR 112.</p>	10/02/2017
OGLA	<p>Cultural Distances for wells and production appear incorrect Removed typo in Fencing BMP. Updated Siting Rationale. Siting Rationale needs to be stronger. - Operator sending Plat of planned subdivision which is restricting Location - 01/04/2018 - Working with Operator on Siting Rationale - 01/04/2018 Location lies within a Sensitive Area with potential shallow groundwater. Operator is using a pitless, closed-loop system. Additional Conditions of Approval for the protection of groundwater are not warranted at this time since the cuttings and fluids are not disposed of on-location.</p> <p>Moved SPCC citing to the Submit Tab.</p>	08/11/2017
Permit	LGD and public comment periods have been extended from 8/17/2017 to 8/27/2017 at the request of the Adams County LGD.	08/02/2017
Permit	Passed completeness.	07/28/2017
OGLA	Buffer Zone Completeness passed.	07/28/2017
Permit	Referred to OGLA Supervisor for buffer zone review.	07/28/2017
OGLA	Buffer Zone Completeness review - Reference Area photos and map not applicable for cropland, remove these attachments. Missing the following 604.c.(2) mitigation measure BMPs: Closed Loop Drilling-Pit Restrictions & Green Completions-Emission Control Systems. Returned to Draft for operator to correct.	07/27/2017
Permit	Referred to OGLA Supervisor for buffer zone review.	07/25/2017
OGLA	Pushed to Draft at request of operator	07/24/2017
Permit	Referred to OGLA Supervisor for buffer zone review.	07/24/2017
OGLA	Did not pass Buffer Zone completeness review - missing Rule 305.a pre-application notification cert, reference area photos and map not applicable for cropland. Contacted the	07/18/2017

	operator and Push to Draft	
Permit	Referred to OGLA Supervisor for buffer zone review.	07/13/2017

Total: 16 comment(s)

