

FORM  
2A

Rev  
04/18

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:

401611549

Date Received:

09/18/2018

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:

**462850**

Expiration Date:

**02/28/2022**

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: 10583  
 Name: PETRO OPERATING COMPANY LLC  
 Address: 9033 E EASTER PLACE SUITE 112  
 City: CENTENNIAL State: CO Zip: 80112-2105

Contact Information

Name: ROGER PARKER  
 Phone: (303) 475-5640  
 Fax: ( )  
 email: rogeraparker9@aol.com

FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): 20150075     Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- Waste Management Surety ID (Rule 704): \_\_\_\_\_

LOCATION IDENTIFICATION

Name: FLASCHENRIEM PAD Number: 3-4N-68W  
 County: WELD  
 Quarter: SE Section: 3 Township: 4N Range: 68W Meridian: 6 Ground Elevation: 5068

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: 1833 feet FNL from North or South section line  
2181 feet FWL from East or West section line

Latitude: 40.344180 Longitude: -104.991540

PDOP Reading: 1.7 Date of Measurement: 03/13/2018

Instrument Operator's Name: Brian Rottinghaus



Name: M & J Dairy, LLC Phone: \_\_\_\_\_  
 Address: 3400 E. State Hwy 60 Fax: \_\_\_\_\_  
 Address: \_\_\_\_\_ Email: \_\_\_\_\_  
 City: Loveland State: CO Zip: 80537  
 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 02/22/2018

**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:	<u>675</u> Feet	<u>835</u> Feet
Building Unit:	<u>1003</u> Feet	<u>750</u> Feet
High Occupancy Building Unit:	<u>5280</u> Feet	<u>5280</u> Feet
Designated Outside Activity Area:	<u>5280</u> Feet	<u>5280</u> Feet
Public Road:	<u>2165</u> Feet	<u>1956</u> Feet
Above Ground Utility:	<u>756</u> Feet	<u>526</u> Feet
Railroad:	<u>5280</u> Feet	<u>5280</u> Feet
Property Line:	<u>475</u> Feet	<u>253</u> 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

Does the UMA Facility meet the definition of a Large UMA Facility  Yes  No

- 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: 08/29/2018

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 04/20/2018

Pre-application Notifications (required if location is a Large UMA Facility)

Date of Rule 305A.a.(1)A Notice of intent to construct a Large UMA Facility to Local Government: 09/10/2018

Date of Rule 305A.a.(1)B Notice of intent to construct a Large UMA Facility to Surface Owner: 02/22/2018

Date of Rule 305.a.(3) Large UMA Facility Notice to Proximate Local Governments: 09/10/2018

Large UMA Facility Form 2A Process Initiation (check all that apply)

- Rule 305A.f.(1)A. Local Government and Operator have reached agreement regarding the siting of the Large UMA Facility (attach certification of Rule 305A compliance)
- Rule 305A.f.(1)B. Rule 305A.e exception claimed (if checked then a 305A exception must be checked on the Exceptions Tab)
- Rule 305A.f.(1)C. Local Government waived 305A procedures for this proposed location (attach waiver as evidence of Rule 305A compliance)
- Rule 305A.f.(1)D. The Local Government did not respond in writing within 30 days of receiving the notice of intent to construct (attach certification of Rule 305A compliance)
- Rule 305A.f.(1)E. The Local Government and Operator have engaged in consultation pursuant to Rule 305A.c. but have not reached agreement within 90 days of the 305A.a.(1)A. notice of intent to construct
- Rule 303.c.(1). Form 2A submittal is consistent with a Rule 216.f.(3) Comprehensive Drilling Plan or a Local Government comprehensive plan that specifies locations for oil and gas facilities. (attach Rule 303.c.(1) supporting documentation)

## 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.

After careful consideration with the surface owner and the operator the wells and facilities were located on the property in a manner to maximize the distance to offsetting building units. After looking at all possible alternate options it was determined that this layout is least impactful and as far as possible from neighboring building units and property's, while also remaining operationally feasible for the operator. This property is zoned agricultural and the buffer zone neighboring property is zoned and used as industrial area. Also per the Surface Use and Damage Agreement on Page 4, itm 2.4a, the location shall be located in the southwest part of the Surface Use Area in order to allow Owner the right to use of the northerly part of such Surface Use Area. Page 4, item 2.7b, the access from and to public roads to the Surfae Use Area shall be located on the South boundary line of the Subject Lands.

## 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 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: #16 Colby loam, 3 to 5% slopes  
NRCS Map Unit Name: #42 Nunn clay loam, 1 to 3% slopes  
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: 90 Feet

water well: 2210 Feet

Estimated depth to ground water at Oil and Gas Location 10 Feet

Basis for depth to groundwater and sensitive area determination:

Distance to nearest:

1. Downgradient surface water feature: 90' to the nearest pond to the NE.
2. Water well: Permit #118757, to the NW aprx. 2210'. Of all water wells within a 1 mile radius, none show a static water level.
3. Estimated depth to ground water at Oil & Gas location: aprx 10' based upon several standing ponds nearby, which are runoff from the nearby Dairy Farm manure piles which also collect some rain runoff.

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)

## LARGE UMA FACILITY EXCEPTIONS

- 305A.e.(1)A. Local Government has currently opted out of Rule 305A notification and consultation processes
- 305A.e.(1)B. Pre-existing agreement with Local Government (attach copy of relevant provisions to 2A per Rule 303.b.(3)K).
- 305A.e.(1)C. Approved site specific development plan (attach copy of relevant portions of the plan and approval by the Local Government to Form 2A per Rule 303.b.(3)K)
- 305A.e.(1)D. Large UMA Facility is within an oil and gas operations area (attach copy of relevant portions of the plan and approval by the Local Government to Form 2A per Rule 303.b.(3)K).

## 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

A signed LUMA Waiver is attached.

The attached Proposed Scaled Facility Drawing shows the Oil & Water Tanks are all contained within Lined Steel Containment Fences with a limit of 2 tanks in each with a capacity of at least 150% of the largest tank within each.

Stormwater: Location will be covered under this operator's field wide permit, permit number COR03 XXXX in process.

We do not anticipate having temporary storage tanks on location during the high-water time post-completions flowback. We plan to have the tank battery constructed pre-completion and will be using the tanks in the permanent battery for oil and water storage.

Petro Operating had meetings and conversations with both Weld County and Johnstown. Additionally, Petro met with the offsetting Building Unit Owner (USAE) who owns the large industrial building to the south east. Jason Maxey (Weld County LGD) also attended this meeting. USAE was happy with our proposal and their only concern was reciprocal setback for future building expansion they have planned. Given the layout out of the pad and the distance to USAE planned expansion no impact is anticipated. USAE stated they have no issues with our planned development. The USAE is the only building unit within 1000' of the location and is the only reason this pad meets the LUMA criteria.

Petro also submitted and received approval of the Weld County WOGLA which includes an approved ERP reviewed by local emergency responders. Petro has full Weld County approval to move forward with this project.

Johnstown is the proximity local government and raised concerns about traffic impact on Johnstown maintained roads. Petro conducted a traffic and road study and reached a maintenance agreement with Johnstown. Petro will monitor impacts to local roads and conduct repairs consistent with the agreement reached between Petro Operating and Johnstown. Johnstown also provided a signed Proximity Local Government waiver which has been submitted to the COGCC.

At this time all concerns related to offsetting Building Units and local governments have been addresses.

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

Signed: \_\_\_\_\_ Date: 09/18/2018 Email: paul.gottlob@iptenergyservices.com

Print Name: PAUL GOTTLÖB Title: Regulatory & Engin. Tech.

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: 3/1/2019

## 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.**

<b>COA Type</b>	<b>Description</b>
	Significant changes to this location, including, but not limited to, equipment changes such as addition of tanks or separators, increase in disturbed area will require an amended 2A.
	Nearest building is a large commercial building placing this location in a LUMA designation. Operator did not notify the local government for the LUMA process under Rule 305.A.a. Attached correspondence from the Operator to reject the 2A.

### **Best Management Practices**

<b>No</b>	<b>BMP/COA Type</b>	<b>Description</b>
1	Planning	604.c(2)M: Fencing: Per the SUA the location will be adequately fenced to restrict access by unauthorized persons.
2	Planning	604.c.(2)N: Control of fire hazards: All material that is considered a fire hazard shall be a minimum of 25' from the wellhead tanks or separators. Electrical equipment shall comply with API IRP 500 and will comply with the current national electrical code.
3	Traffic control	604.c.(2)S: Access Roads: The access road will be constructed to accommodate local emergency vehicles. This road will be maintained for access at all times. Traffic will be routed to minimize local interruption. During construction and through the life of this location, Operator will utilize watering, via water trucks, to control fugitive dust. Additionally, the access road will be constructed with aggregate road base material and vehicle speeds will be limited to ten miles per hour to reduce dust.
4	General Housekeeping	804: Visual Impacts: All long term facility structures will be painted a color that enables the facilities to blend in with the natural background color of the landscape, as seen from a viewing distance and location typically used by the public.
5	General Housekeeping	Maintain appearance with garbage clean-up; a trash bin will be located on site to accumulate waste by the personnel drilling the wells. Site will have unused equipment, trash and junk removed immediately.
6	General Housekeeping	604.c.(2)P. Trash Removal: All trash, debris and material not intrinsic to the operation of the oil and gas facility shall be removed and legally disposed of as applicable.
7	Storm Water/Erosion Control	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). Typical stormwater BMPs installed include a diversion ditch and berm with sediment traps and installation of wattles where necessary.
8	Material Handling and Spill Prevention	604.c.(2)F. Leak Detection Plan: Operator will monitor production facilities weekly at a minimum to a maximum of daily to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks and fittings. Additionally, annual SPCC inspections will be conducted and documented. Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Inspection and record retention of flowline testing will be in accordance per COGCC regulation. All records will be made available to the COGCC upon to request.
9	Material Handling and Spill Prevention	604.c.(2)R Tank Specifications: Tanks will be designed, constructed and maintained in accordance with NFPA Code 30 (2008 version). All tanks are visually inspected by the operator weekly at a minimum to a maximum of daily and annual SPCC inspections will be conducted and documented. Inspection and record retention of tank inspections will be in accordance per SPCC regulation. All records will be made available to the COGCC upon to request.
10	Material Handling and Spill Prevention	604.c.(3)B. Berm Construction. Tank berms shall 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 weekly at a minimum to a maximum of daily to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Tertiary containment, such as an earthen berm, will be installed around production facilities. All berms will be visually checked daily to ensure proper working condition. Inspection and record retention of berm inspections will be in accordance per SPCC regulation. All records will be made available to the COGCC upon request.

11	Material Handling and Spill Prevention	604.c.(2).G. Berm construction. Tank berms shall 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 weekly at a minimum to a maximum of daily to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel.
12	Material Handling and Spill Prevention	<p>604.c.(4)B.i. All material that is considered a fire hazard shall be a minimum of 25' from the wellhead tanks or separators. Electrical equipment shall comply with API IRP 500 and will comply with the current national electrical code. Petro complies with state and federal laws, rules and regulations governing the presence of any petroleum products, toxic or hazardous chemicals or wastes on the subject lands.</p> <p>i. The drill rig, all generators, and all living quarters will be grounded with 8 ft copper grounding rods. The same practice will be done for all production equipment. All electrical motors on the drill rig and production equipment will be equipped with automatic overload breaker switches.</p> <p>ii. Fluid leak detection, repair, reporting, and record keeping for all above and below ground on-site fluid handling, storage, and transportation equipment. Daily AVO checks by company personnel, recorded on a daily report, and available upon request.</p> <p>iii. Automated well shut in control measures to prevent gas venting during emission control system failures or other upset conditions. Gas sales line pressure will be continuously and automatically monitored by pressure controllers installed on the first stage vessel of each separator. In the event of an overpressure (blockage) or under-pressure (leak) event, automatic fail-close valves at the separator's first stage inlet will be actuated, shutting in all wells. Second-stage separator gas and third-stage heater-treater gas will be gathered and compressed into the gas sales line by the VRU. In the event of VRU failure, second and third stage gas will be diverted to the high pressure side of two parallel ECDs with a combined destructive capacity of 2.0 MMCFD. The ECDs will have automatic pilot ignitors and burner management systems (BMS) installed. The BMS will automatically activate the shut off valves at the first stage separator inlets to shut in all wells if the ECD pilot burners are not lit. All separators will have automatic liquid level monitors installed in first and second stage vessels. In the event of high liquid levels in either vessel, the automatic shut off valves at the separator inlets will be actuated, shutting in all wells. Tank vapors will be routinely routed to the low pressure side of these same two ECDs.</p> <p>iv. Zero flaring or venting of gas upon completion of flowback, excepting upset or emergency conditions, or with prior written approval from the Director for necessary maintenance operations. Will send gas to sales or shut wells in after flowback operations are complete.</p> <p>v. Storage tank pressure and fluid management. All oil and water tanks will have high level monitors set to actuate at 18" from the top of the tanks. When any of the high level monitors register a high tank condition, the shutoff valves at the separator inlets will be actuated, shutting in all wells. Any pressure or level or burner event that causes the separator shut off valves to be actuated will also send text alerts to the production superintendent and first and second lead pumpers, after the wells are shut in. POC will use instrument air, not process gas, to actuate the automatic pneumatic shut in valves on the separators.</p> <p>vi. Proppant dust control. Will use gravity-feed sand box system. No pneumatic transfer of proppant</p>
13	Dust control	805.c. Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers may be used.

14	Construction	803. Light sources during all phases of operations will be directed downwards and away from occupied structures where possible. 803. Permanent lighting will be installed around the facility to allow both the operator and haulers to conduct safe operations at night. All lights will be directed down toward the location or shielded so no light pollution leaves the facility.
15	Construction	604.c.(2).Q. All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.
16	Construction	604.c.(2).E. This will be a multi-well pad, located in a manner which allows for the greatest distances possible from building units.
17	Noise mitigation	604.c.(2)A. Sound walls will be used during drilling and completion operations. Sound walls will be installed at least on the North and East sides, the others will be determined at time of installation.
18	Emissions mitigation	Operator will bring a new or expand existing gas sales lines, in a timely manner, to send salable quality gas immediately down the sales line.
19	Emissions mitigation	604.c.(2)C.i. Green Completions - Emission Control System. Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completions techniques pursuant to COGCC Rules.
20	Odor mitigation	805. Oil & gas facilities and equipment shall be operated in such a manner that odors and dust do not constitute a nuisance or hazard to public welfare.
21	Drilling/Completion Operations	604.c.(2)L. Closed chamber drill stem tests shall be allowed. All other drill stem tests shall require approval by the Director. None planned for these wells.
22	Drilling/Completion Operations	604.c.(2).K. Pit level Indicators shall be used for tanks on location.
23	Drilling/Completion Operations	604.c.(2).O. All loadlines shall be bull plugged or capped.
24	Drilling/Completion Operations	604.c.(2)B.i. Operator will be utilizing a closed loop system.
25	Drilling/Completion Operations	604.c.(2)T. Within 90 days subsequent to the time of plugging and abandonment of the entire site, superfluous debris and equipment shall be removed from the site. Identification of plugged and abandoned wells will be identified pursuant to 319.a.(5).
26	Drilling/Completion Operations	604.c.(2).U. The operator shall identify the location of the 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.
27	Interim Reclamation	Operator shall be responsible for segregating the topsoil, backfilling, re-compacting, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and shall reclaim such area to be returned to pre-existing conditions as best as possible with control of all noxious weeds.

Total: 27 comment(s)

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2316475	CDPHE CONSULTATION
2316527	WAIVER
2316533	RULE 306.E. CERTIFICATION
2316534	FACILITY LAYOUT DRAWING
401611549	FORM 2A RESUBMITTED
401765755	FORM 2A SUBMITTED
401765756	FORM 2A REJECTED
401765872	MULTI-WELL PLAN
401765874	ACCESS ROAD MAP
401765875	HYDROLOGY MAP
401765876	LOCATION DRAWING
401765877	LOCATION PICTURES
401765880	WASTE MANAGEMENT PLAN
401765881	SURFACE AGRMT/SURETY
401765882	PRE-APPLICATION NOTIFICATION CERTIFICATION
401765883	NRCS MAP UNIT DESC
401765884	NRCS MAP UNIT DESC
401765885	WAIVERS
401766791	FORM 2A SUBMITTED
401775810	RULE 305A CERTIFICATION OF COMPLIANCE
401776162	FORM 2A RESUBMITTED
401790644	FORM 2A RESUBMITTED

Total Attach: 22 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Permitting review Complete. Send to Final Approval. The following changes were made with Operator concurrence: - corrected "Date Planned to commence construction" to "3/2/2019" and "Estimated date that interim reclamation will begin" to "9/2/2019"	02/28/2019
OGLA	COGCC's response to the public comment by USE Real Estate Holdings - The proposed Oil and Gas Location is in a Large Urban Mitigation Area (LUMA) due to the size of the USE building and its proximity to the proposed location. Because the proposed location is a LUMA location, the Form 2A includes enhanced site specific Best Management Practices, which provide an elevated level of protection of public health, safety and the environment. CDPHE also conducted a formal consultation for the location and its recommendations are in the CDPHE Consultation attachment. A December 6, 2018 meeting between the operator, the Weld County Oil and Gas Specialist, Jason Maxey and USE is described in the Rule 306.e Certification attachment. USE's concerns were reportedly addressed in the meeting and USE reportedly no longer objects to the project.	02/28/2019
OGLA	Spoke to Operator on the phone regarding equipment count. Operator confirmed equipment count was correct - two wells per separator and oil tanks would be adequate. Operator understood that adding tanks or separators would require an amended 2A.	02/26/2019
OGLA	Send request for additional information regarding BMPs. Added information regarding correspondence between the Operator, local Governments, and neighboring building units to the Operator comments section. Added information for 604.c.(4)B to the BMP section.	02/25/2019
OGLA	Operator responded with additional BMPs, 10 wells not 8 and 4 ECDs - updated facility list. Request new facility layout drawing, request site specific for 604.c.(4)B. Request a comment on communication with local and proxy governments.	02/13/2019

OGLA	Operator provided 306.e. and waiver from proximate local government (attached). Requested information from Operator regarding well count, equipment count (ECDs), temporary tanks, 2A for surface water and hydrology map do not match, missing BMPs for 604.c.(3) and 604.c.(4) for LUMA location, ask for concurrence to remove downhole BMPs, missing lighting mitigation, clarification on noise and emissions mitigation measures. Request comment on communication with local and proximate local governments.	02/13/2019
OGLA	OGLA spoke with Town of Johnstown City Manager on 2/11/2019. City Manager informed COGCC Johnstown had made an agreement with the Operator regarding the use of the Johnstown roads.	02/12/2019
OGLA	Spoke to Operator on 12/27 regarding proximate government - they are working on getting a letter from the Proximate local government.	01/02/2019
OGLA	COGCC met with CDPHE for onsite visit on 10/24. CDPHE provided their consultation letter on 11/6/2018 - Attached.	11/20/2018
OGLA	The CDPHE consult task was not selected. Contacted CDPHE for consult - 40-day comment was incorporated into public comment time-frame.	10/11/2018
Permit	Passed Completeness	10/10/2018
Permit	Sent back to draft since the person in contact information is a consultant	10/10/2018
Permit	Returned to draft for: - UMA and LUMA box needs to be checked with the date filled in for the waiver signed by the LGD.	09/21/2018
OGLA	Contacted Operator on 8/27/2018 regarding LUMA location. Operator wanted to confirm building unit was commercial vs. warehouse and would get back to COGCC. Place 2A ON HOLD	09/07/2018
OGLA	Location and production are less than 1,000 feet from a commercial building measuring 120,000 square feet or 24 building units. Location is for 8 proposed wells making is a Large Urban Mitigation area. Operator did not commence the LUMA process prior to submitting the 2A. Inform Operator this 2A needs to be withdrawn or rejected.	08/27/2018
Permit	Passed Completeness.	06/04/2018
OGLA	Passed Buffer Zone completeness review	06/04/2018
OGLA	Did not pass Buffer Zone completeness review. Dry land cropland box is checked - If dry land crop land then Reference Area photos and map do not apply, missing Waste Management Plan, 305.a.(2) date of 5/27/18 is <30 days prior to Form 2A submittal. If estimated groundwater depth is 10 feet, then location is in a sensitive area. Push to Draft - contacted operator.	06/04/2018
Permit	Referred to OGLA supervisor for buffer zone review.	05/23/2018

Total: 19 comment(s)