

STATE OF
COLORADO

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

RE: DAMORE 5-18HZ PAD AND PROWANT 4-18HZ PAD Form 2A Director's Objective Criteria

1 message

Schindler, Lisa <Lisa.Schindler@anadarko.com>

Thu, May 23, 2019 at 4:03 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, "VanShura, Jayson" <Jayson.VanShura@anadarko.com>

Hi Doug:

Thanks very much for consolidating the email chain on this pad, and for the follow up. Per our discussion, I've included both the Damore and Prowant pads to this email in the hopes that we can clear up the remaining items for the Director Review in one fell swoop. Please let me know if you discover any other gaps in our 2A applications, or if Director Robbins requires any other information for his review.

DAMORE PAD (LOC ID 401810129)

- **Irrigation Ditch:** We have revised access plans for the Damore (401801129) location so that a ditch crossing will not be needed.
 - Attached please find revised access for the Damore Pad and Prowant Facility. Would you be able / willing to swap out this attachment on the pending 2A for the Damore Pad?
 - This exhibit includes the access for both the Damore and the Prowant pad, since the Prowant facility access comes off the Prowant pad access.
- **Oil and Gas Locations within 1,500' of a Building Unit:** Thank you for the confirmation
- **Adjacent Local Government Correspondence:**
 - WOGLA has been approved. Please let me know if the COGCC needs to see a copy of the approval.
 - Larimer County LGD was notified during the WOGLA Notification Process as required. They did not provide any comments.
 - WCR 13 / LCR 1 is under the jurisdiction of Weld County. Access Permit was approved by Weld County and is available upon request.
 - The EAP (Emergency Action Plan) was approved by both Weld County OEM and Windsor Severance Fire District. No action was required by Larimer County on this EAP
 - Pad is ~2,000 from Johnstown limits
- **Oil and Gas Locations within a Sensitive Area for water resources:** Please do add the COA you proposed: *The location is in a sensitive area due to shallow groundwater, therefore, the operator shall line the secondary containment areas for the tanks (temporary and permanent) and separators with an impervious material.*
- **Hydrocarbon or Produced Liquid Storage:** coordination with local emergency responders from Weld County OEM and from the Windsor Severance Fire Protection District were completed in the EAP as described above. Please let me know if the COGCC requires any additional detail about the EAP.

Prowant (LOC ID 401810307)

- **Access Road:** This should be the FINAL iteration of the access road for the Prowant pad (401810307). Can you please swap out the exhibit on the 2A for the one attached? So sorry for all the iterations on this.
- **Oil and Gas Locations within 1,500' of a Building Unit:** Please let me know if the COGCC needs anything else
- **Adjacent Local Government Correspondence:**
 - WOGLA has been approved. Please let me know if the COGCC needs to see a copy of the approval.
 - Larimer County LGD was notified during the WOGLA Notification Process as required. They did not provide any comments.
 - WCR 13 / LCR 1 is under the jurisdiction of Weld County. Access Permit was approved by Weld County and is available upon request.
 - The EAP (Emergency Action Plan) was approved by both Weld County OEM and Windsor Severance Fire District. No action was required by Larimer County on this EAP
 - Pad is ~2,000 from Johnstown limits

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Thanks again for all your help with these locations Doug. Hope you have a great weekend.

Lisa

Lisa Schindler

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

Sent: Wednesday, May 22, 2019 4:11 PM

To: Schindler, Lisa <Lisa.Schindler@anadarko.com>; VanShura, Jayson <Jayson.VanShura@anadarko.com>

Subject: DAMORE 5-18HZ PAD Form 2A Director's Objective Criteria

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Lisa & Jayson,

I wanted to start a new correspondence with KMG for the Damore Form 2A location as the previous one was getting long and tricky for me to keep straight what has and has not been addressed. From the original correspondence it looks like the following from KMG is still pending.

6) The Farmers Ditch shown on the Location Drawing cuts across the proposed location. How will KMG cross this irrigation ditch to access the PROWANT 4-18HZ Production Facility area as the Access Road Map shows no access to it? Are the owners of this irrigation ditch aware that KMG intends to build a large Oil & Gas Location that will be bisected by their irrigation ditch?

I have requested additional detail about how the ditch crossing will be constructed, and a summary of correspondence with The Farmers Ditch, which is the ditch company. This information will be sent to you ASAP.

As you know, the COGCC has released the Director's Objective Criteria which are being applied against all pending Form 2As. It appears the DAMORE 5-18HZ PAD Form 2A triggers the following Director's Objective Criteria:

* **Oil and Gas Locations within 1,500' of a Building Unit** I believe the BMPs associated Rule 604.c. (2) & 604.c.(3) that KMG has provided on the Form 2A address the additional protections necessary for the location being within 1,500 feet of a Building Unit.

* **Oil and Gas Locations within 1,500' of a municipal boundary, platted subdivision, or county boundary.** It appears this location is within 1,500 feet of Larimer County, Johnstown, and Windsor. Has KMG been in contact with these municipalities and county in regards to any concerns they may have and/or use of their infrastructure (e.g. roads)?

* **Oil and Gas Locations within a Sensitive Area for water resources** This location is a Sensitive Area due to its proximity to surface water features and possible shallow groundwater. KMG has provided a Berm Construction BMP that addresses protecting proximate surface water bodies from impact. I would like to place the following Condition of Approval on this Form 2A to address protecting possible shallow groundwater from impacts: ***The location is in a sensitive area due to shallow groundwater, therefore, the operator shall line the secondary containment areas for the tanks (temporary and permanent) and separators with an impervious material.***

* **Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels** Although the majority of tanks on this location will be temporary for produced water storage, has KMG conducted any coordination with local emergency responders for this location in case of a fire or explosion?

Please be aware that when the Director conducts his Final Review of this Form 2A, he may request additional protective measures to address these four Objective Criteria.

Doug Andrews

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 **DAMORE AND PROWANT 5-18HZ_ACCESS_MAP_REV_20190522.pdf**
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