

STATE OF
COLORADO

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

Nickel Road Operating - Elder Pad Form 2A (Doc #401548407)

3 messages

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

Thu, May 23, 2019 at 1:27 PM

Doug, in response to the final Director's Review Criteria, Nickel Road has preemptively consolidated our facility layout for the Elder Pad to better align with our phased development approach and the applicable criteria to protect public health, safety, welfare, the environment and wildlife. Per my review, the following criteria are applicable to the Elder pad location, which we have addressed as follows in the redesign:

Criteria # 5a – location falls within a Floodplain

- NRO was able to successfully redesign the pad disturbance to remain entirely outside of the 100-year floodplain boundary.
 - Construction layout diagram attached.
 - New Disturbance acreage provided on attached word doc.

Criteria # 8 – more than 18 tanks on location

- NRO was able to reduce the number of tanks on this location to a maximum of 18 total tanks. These tanks will be sufficient to accommodate our phased development plan and in anticipation of having a LACT unit and oil pipeline take-away capacity available at some point during development.
 - New Facility layout diagram attached.
 - Updated facility equipment counts and pipeline counts provided on attached word doc.

NRO had this pad on our priority list for a 5/1/19 approval date as we were targeting a 6/1/19 construction start date. Penny has been in contact with me to finalize the Form 2s for final approval as soon as possible (pending supplemental local government information). Does it make sense to go ahead and swap these drawings out and update the appropriate data fields at this time to avoid further delay in approvals and subsequent development? I am happy to discuss further via phone if you would like or am always available via email if you have any followup questions at this time.

Thank you,

Jennifer

Jennifer Lind*Regulatory & Environmental Manager*

Nickel Road Operating LLC

303-406-1117


jennifer.lind@nickelroadoperating.com



3 attachments

 **_Elder Pad_Construction Layout.pdf**
1608K

 **_Elder Pad_Facility Exhibit r1.pdf**
860K

 **_Elder Pad_Facility List r1.docx**
82K

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

Fri, May 24, 2019 at 11:23 AM

Jennifer,

Per our telephone conversation this morning, the change in the disturbance area to get outside of the mapped floodplain requires the following attachments to also be revised:

Location Drawing

Access Road Map

Hydrology Map

Reference Area Map (If NRO has Reference Area Pictures now they should be provided as well)

Also, the following Director's Objective Criteria still need to be addressed by NRO.

* Criteria 5c for an Oil & Gas Location is a Sensitive Area due to proximity to surface water - I would like to place the following Condition of Approval on the Form 2A: *Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect Owl Creek located 277 feet southeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.*

* Criteria 8 for an Oil & Gas Location with storage of hydrocarbons or produced liquid in more than 18 tanks or 5,200 barrels of storage. You have indicated the tanks will be 500 barrels in capacity putting the total in excess of 5,200 barrels. Please provide additional information as to NRO's coordination with local emergency responders in developing emergency response plans in case of fires or explosions. Also, please provide any information as to how truck traffic will be managed to minimize impacts to nearby residents.

Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180

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

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

[Quoted text hidden]

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

Tue, May 28, 2019 at 11:06 AM

Doug, thank you for your assessment and your time last week discussing the proposed changes to the Elder Pad location. Attached, please find the following:

- Updated location drawing
- Updated access road map
- Updated hydrology map
- Updated reference area map
- Reference area photos
- Weld County Approved Emergency Action Plan (EAP)

Additionally, NRO concurs with the proposed sensitive area COA being posted on this application. The new facility layout map, facility and flowline list and grading (construction layout) plan was provided via separate email on 5/23/19. Please advise should you require any additional information at this time. I truly appreciate your assistance in getting this application updated in a timely manner.

Thank you,

Jennifer

Jennifer Lind

Regulatory & Environmental Manager

Nickel Road Operating LLC

303-406-1117

jennifer.lind@nickelroadoperating.com



From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Friday, May 24, 2019 11:23 AM
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>
Cc: Garrison - DNR, Penny <penny.garrison@state.co.us>
Subject: Re: Nickel Road Operating - Elder Pad Form 2A (Doc #401548407)

Jennifer,

Per our telephone conversation this morning, the change in the disturbance area to get outside of the mapped floodplain requires the following attachments to also be revised:

Location Drawing

Access Road Map

Hydrology Map

Reference Area Map (If NRO has Reference Area Pictures now they should be provided as well)

Also, the following Director's Objective Criteria still need to be addressed by NRO.

* Criteria 5c for an Oil & Gas Location is a Sensitive Area due to proximity to surface water - I would like to place the following Condition of Approval on the Form 2A: *Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect Owl Creek located 277 feet southeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.*

* Criteria 8 for an Oil & Gas Location with storage of hydrocarbons or produced liquid in more than 18 tanks or 5,200 barrels of storage. You have indicated the tanks will be 500 barrels in capacity putting the total in excess of 5,200 barrels. Please provide additional information as to NRO's coordination with local emergency responders in developing emergency response plans in case of fires or explosions. Also, please provide any information as to how truck traffic will be managed to minimize impacts to nearby residents.

Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180

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

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

[Quoted text hidden]

6 attachments



_Elder Pad_Location Dwg r1.pdf
5007K



_Elder Pad_Access Road Map r1.pdf
590K



_Elder Pad_Hydrology Map r1.pdf
843K



_Elder Pad_Ref Area Map r2_5.28.19.pdf
548K



_Elder Pad_Ref Area Photos_5.17.19.pdf
990K



Approved_Updated_Elder Pad_Weld Co Emergency Action Plan and TRP_4.11.19.pdf
2448K