

**STATE OF
COLORADO****Andrews - DNR, Doug** <doug.andrews@state.co.us>

Boydson 3535

5 messages

Heather Mitchell <HMitchell@verdadoil.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Jul 1, 2019 at 11:16 AM

Hi Doug – I just wanted to add/revise some BMP language for when you get to the Boydston 3535 review.

This pad meets Criteria 8 – 18+ tanks

AVO (Audio, Visual, Olfactory) inspections of pipe and connections will be performed daily on production equipment to detect leaks which will be immediately corrected, repaired and reported to COGCC as required.

Containment will be used during fueling of equipment to contain spills and leaks during all phases of operations.

Spill prevention Control Countermeasure (SPCC) will be in place to address any spills associated with oil and gas operations. Tank secondary containment will be impervious lined steel berms with capacity > 150% volume of the largest tank. Pad will also have tertiary containment of ditch and berm to prevent any spills from leaving site. Any spills will be immediately cleaned up and reported if volume exceeds reporting limit.

Verdad has submitted a WOGLA application with Weld county that addresses site safety and contains an emergency action and tactical response plan. Each location is assigned a physical address for emergency responders to locate the site in the event of an emergency.

Please let me know if you have any questions!

Heather Mitchell

Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Heather Mitchell <HMitchell@verdadoil.com>

Mon, Jul 8, 2019 at 1:43 PM

Heather,

Will you let me know the date the WOGLA application was submitted (and the date it was approved if it has been).

Also, will you provide me with updated construction start date and interim reclamation start date. Currently these two dates on the Form 2A are for back in 2018.

Thanks.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
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Department of Natural Resources

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Heather Mitchell <HMitchell@verdadoil.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Jul 8, 2019 at 3:47 PM

We submitted the notice of WOGLA, June 28, 2019. The full application has not been submitted yet.

Construction date November 2019, reclaim May 2020.

Sent from my iPhone

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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Heather Mitchell <HMitchell@verdadoil.com>

Tue, Jul 9, 2019 at 2:12 PM

Heather,

Just had the Director Objective Criteria Review for this Form 2A this morning. The Director says this one is good to go; however, we want to tighten up a few BMPs prior to Final Approval.

Any spills will be immediately cleaned up and reported if volume exceeds reporting limit. - The way this is phrased can be interpreted that only spills that exceed COGCC reporting limits will be cleaned up. Can we change this to state "**All** spills will be immediately cleaned up and **will be** reported if volume exceeds reporting limit."

Mud control: when conditions exist that roads are excessively muddy, additional fill material will be added in order to dehydrate the environment and reduce the amount of material that is transported from the wells roads and location to off-site areas. - The point at which roads are "**excessively muddy**" is too late. How exactly will Verdad "**dehydrate the environment**"? Does Verdad have a problem with replacing the Mud Control BMP with the following COA: "*Operator will implement effective, temporary vehicle tracking control at the location egress to prevent transport of sediment offsite and onto the public road during construction, drilling, completions, stimulation, and flowback operations. Appropriate vehicle tracking control, such as a properly sized cattle guard, will still be required during production operations.*"

Doug Andrews

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Heather Mitchell <HMitchell@verdadoil.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Jul 9, 2019 at 3:57 PM

Doug,
We are good with those changes! Thank you!
Heather

Sent from my iPhone
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