

June 21, 2019

Mr. Jeff Robbins, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

**RE: SB 19-181 Required Director Objective Criteria Summary
COT 30-J Pad: NESW Section 30, Township 7 North, Range 66 West
Weld County, Colorado**

Dear Director Robbins,

Bayswater Exploration & Production, LLC (Bayswater) has filed a Form 2A Oil and Gas Location Assessment (OGLA) for the above referenced pad. In accordance with the provisions set out in Colorado Oil and Gas Conservation Commission (COGCC) SB 19-181: Required Director Objective Criteria, this letter is intended to summarize compliance with and aid in the analysis of Required Director Objective Criteria.

1) Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area and Large UMA Facility locations:

Response: There are two building units within 1500' of the pad edge, but that are greater than 1500' from any well or equipment. The building unit owners were not contacted.

Bayswater did consider the placement of the wells and equipment to keep them as far as possible from those building units but did not consider the pad edge to have any nuisance effects necessary to amend the operational disturbance to avoid being within 1500'.

2) Oil and Gas Locations within a municipality:

Response: N/A.

3) Oil and Gas Locations within 1,500' of a municipal boundary, platted subdivision, or county boundary:

Response: N/A.

4) Oil and Gas Locations within 2,000' of a school property line:

Response: N/A.

5) Oil and Gas Locations within:

a. a Floodplain or Floodway:

Response: N/A.

b. an identified public drinking water supply area (i.e. Rule 317B buffer zone, or the Brighton Public Water System):

Response: N/A.

c. a sensitive area for water resources:

Response: Location is sensitive due to depth to groundwater and proximity to surface water. The concrete ditch adjacent to the location is inactive and will be removed per surface owner request. The separator and tanks areas will be lined and bermed per Construction BMP listed as #8 within the Form 2A.



- 6) **Oil and Gas Locations within a Colorado Parks and Wildlife mapped Restricted Surface Occupancy Area or Sensitive Wildlife Habitat, or locations receiving site- or species-specific CPW comments:**

Response: N/A.

- 7) **Oil and Gas Locations within 1,000' of a Designated Outdoor Activity Area:**

Response: N/A.

- 8) **Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels:**

Response: N/A.

- 9) **Oil and Gas Locations where the operator is using a surface owner protection bond pursuant to Rule 703 to access the surface:**

Response: N/A.

- 10) **Oil and Gas Locations where the Relevant Local Government, or state or federal agency requests additional consultation:**

Response: N/A. The WOGLA for this location was approved on 6/14/19. The Local Government information has been submitted via Google Doc on 6/18/19.

- 11) **Oil and Gas Locations where the operator requests the Director grant a Rule 502.b Variance for an associated permit application:**

Response: N/A.

- 12) **Oil and Gas Locations with an access road in a RSO, SWH, 317B buffer zone, or within 200' feet of a Building Unit on lands not subject to a Surface Use Agreement:**

Response: There were two building unit owners within 200' of the proposed access road. Both have been consulted.

Per Mark Brown:

I personally spoke on the phone with both Mr. Darrin Muggli and Mr. Robert Cooper today, the two surface owners directly North of our planned access point for the COT-J pad on CR 27 that are within 200' of our access point and not under a SUA with Bayswater.

I explained to both parties where we were going to have our access point and that no oilfield traffic should be actually driving further North to their properties, but would be sharing the road with them South on CR 27. Also explained that the pad itself will be way to the West on the City of Thornton surface property and not per se close to their properties.

Mr. Muggli did not express any concerns and I forwarded to him via email a copy of the attached Access Road Map for his reference and to contact me directly if any questions came up in the future here at the office or on my cell phone.



BAYSWATER
EXPLORATION & PRODUCTION, LLC

Mr. Cooper's only concern was South or our access point there is a bit of a rise of CR 27 as it approaches the residence to the South and if vehicles are going very fast at that point he has concerns on visibility and possible collisions. Therefore, he strongly advised to have all vehicle traffic be aware of the spot and slow down accordingly for safe passage. He asked that I mail him a copy of attached Access Road Map and provide my contact information for future reference, which I have done as of this date.

13) A proposed Centralized Exploration and Production Waste Management Facility:

Response: N/A.

14) A Request to Vent or Flare (Form 4) from a location within 1,500' of a Building Unit or High Occupancy Building Unit or within the Denver Metro/North Front Range 8-Hour Ozone Nonattainment Area:

Response: N/A.

15) An Intent to Plug (Form 6) for a well that is associated with a stray gas investigation:

Response: N/A.

16) Oil and Gas Locations proposed by an Operator who is subject to additional individual or blanket financial assurance requirements pursuant to Rule 702.a

Response: N/A.

Bayswater respectfully requests the COGCC approve the Form 2A for the COT 30-J Pad. Many thanks for your consideration of this matter.

Respectfully,

Justin Garrett
Regulatory Analyst
Agent for Bayswater Exploration & Production, LLC