

STATE OF
COLORADO

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

Form 2A review for Verdad Resources' Bringelson Fed 2021 & 2029 location - Doc #402066312

5 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: VR Regulatory <regulatory@verdadoil.com>

Wed, Aug 7, 2019 at 1:29 PM

Heather,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) Verdad has included a BMP that indicates a WOGLA application has been submitted to Weld County. Please provide the date the WOGLA application was submitted.
- 2) In the Land Use section Verdad has indicated the Land Use is Irrigated Cropland. However, a review of Location Pictures and aerial imagery makes me curious if this is correct as it does not appear to be typical of Irrigated Cropland. The Location Drawing indicates it is both Cropland and Rangeland. Will you confirm the Land Use at this proposed Oil & Gas Location. If it is indeed a type of Cropland, I would like to remove the Reference Area Map & Pictures attachments as they are required only when the Land Use is one of the non-Cropland types.
- 3) Verdad has included a Mud control BMP that states: *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."
- 4) Verdad has included a Noise mitigation BMP that discusses both noise and odor mitigation. However, there do not appear to be any Building Units within one mile of this proposed Oil & Gas Location. Additionally, this BMP has a little bit of ambiguity to it that makes it difficult for us to determine what and when these mitigation measures will be employed. Because of this, I would like to remove this BMP from the Form 2A.
- 5) This proposed Oil & Gas Location meet Objective Criteria #8 - more than 18 tanks of hydrocarbon or produced liquid storage. To prevent possible soil contamination, the following Condition of Approval will be applied to the Form 2A: "To minimize potential impacts to soil, the operator shall line the secondary containment areas for the tanks and separators with an impervious material."

Please respond to this correspondence by September 7, 2019. If you have any questions, please contact me.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180
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VR Regulatory <Regulatory@verdadoil.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Aug 8, 2019 at 7:18 AM

I will have a response for you later today.

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VR Regulatory <Regulatory@verdadoil.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, VR Regulatory <Regulatory@verdadoil.com>

Thu, Aug 8, 2019 at 10:18 AM

See my response below

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Wednesday, August 07, 2019 1:30 PM
To: VR Regulatory <Regulatory@VerdadOil.com>
Subject: Form 2A review for Verdad Resources' Bringelson Fed 2021 & 2029 location - Doc #402066312

Heather,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Verdad has included a BMP that indicates a WOGLA application has been submitted to Weld County. Please provide the date the WOGLA application was submitted. **Our notice was submitted on 6/24/2019 – the application will be submitted shortly.**

2) In the Land Use section Verdad has indicated the Land Use is Irrigated Cropland. However, a review of Location Pictures and aerial imagery makes me curious if this is correct as it does not appear to be typical of Irrigated Cropland. The Location Drawing indicates it is both Cropland and Rangeland. Will you confirm the Land Use at this proposed Oil & Gas Location. If it is indeed a type of Cropland, I would like to remove the Reference Area Map & Pictures attachments as they are required only when the Land Use is one of the non-Cropland types. **I spoke with our surveyors on this, they said a time lapse shows this land was cultivated, although right now it looks to just be rangeland – so we were trying to cover all our bases. How is best to handle this one?**

3) Verdad has included a Mud control BMP that states: *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." **No problem with this – thank you. This was updated on our BMPs for future submittals. It actually should have been on this one too.**

4) Verdad has included a Noise mitigation BMP that discusses both noise and odor mitigation. However, there do not appear to be any Building Units within one mile of this proposed Oil & Gas Location. Additionally, this BMP has a little bit of ambiguity to it that makes it difficult for us to determine what and when these mitigation measures will be employed. Because of this, I would like to remove this BMP from the Form 2A. **Please remove**

5) This proposed Oil & Gas Location meet Objective Criteria #8 - more than 18 tanks of hydrocarbon or produced liquid storage. To prevent possible soil contamination, the following Condition of Approval will be applied to the Form 2A: "To minimize potential impacts to soil, the operator shall line the secondary containment areas for the tanks and separators with an impervious material." **That is fine.**

[Quoted text hidden]

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: VR Regulatory <Regulatory@verdadoil.com>

Thu, Aug 8, 2019 at 2:33 PM

1) Verdad has included a BMP that indicates a WOGLA application has been submitted to Weld County. Please provide the date the WOGLA application was submitted. **Our notice was submitted on 6/24/2019 – the application will be submitted shortly.**

I'm a little confused now. Your BMP says the WOGLA application was submitted. However, you are now saying the WOGLA application has not been submitted. I don't know what the notice you are talking about is. We need to know if the actual WOGLA application has been submitted and if it has, on what date.

2) In the Land Use section Verdad has indicated the Land Use is Irrigated Cropland. However, a review of Location Pictures and aerial imagery makes me curious if this is correct as it does not appear to be typical of Irrigated Cropland. The Location Drawing indicates it is both Cropland and Rangeland. Will you confirm the Land Use at this proposed Oil & Gas Location. If it is indeed a type of Cropland, I would like to remove the Reference Area Map & Pictures attachments as they are required only when the Land Use is one of the non-Cropland types. **I spoke with our surveyors on this, they said a time lapse shows this land was cultivated, although right now it looks to just be rangeland – so we were trying to cover all our bases. How is best to handle this one?**

Are crops currently being cultivated and/or harvested on the proposed location? If Yes, are they being Irrigated or is it dryland farming, being used as a hay meadow or pasturing livestock? If No, then its Rangeland. The same questions needs to be

answered for how the land will be used in the future (to the best of your and the surface owner's knowledge).

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VR Regulatory <Regulatory@verdadoil.com>

Fri, Aug 9, 2019 at 8:03 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, VR Regulatory <Regulatory@verdadoil.com>

Hi Doug – there is a 30 day notice that must be sent with the WOLGA application. The actual application has not yet been filed. The BMP should have been switched to “will be filed”

Current and future use – should be rangeland. I will let our surveyor know that he does not need to review what happened in the past.

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

Sent: Thursday, August 08, 2019 2:33 PM

To: VR Regulatory <Regulatory@VerdadOil.com>

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