

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

**COGCC Form 2A review of Verdad Resources' Timbro 0101 location - Doc #402060001**

5 messages

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

Tue, Sep 3, 2019 at 1:37 PM

Heather,

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

- 1) Verdad has included a comment indicating the Notice of WOGLA was submitted on 6/26/19 and that the Application will be submitted 28 days after the comment period, unless it is waived. Did Verdad end up submitting a WOGLA Application? If yes, 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 does not appear to be typical of Irrigated Cropland. To me it appears to be Rangeland. Will you confirm the Land Use at this proposed Oil & Gas Location. If it is indeed Rangeland, please provide whether the identified plant species will come from the NRCS or was a field observation made. If a field observation was made, please provide the date of the observation. Also, which plant community does this proposed location cover; Disturbed Grassland, Native Grassland, or both?
- 3) In the Water resources section Verdad has indicated the estimated depth to groundwater is 0 feet because the nearest water well does not report a groundwater depth. The next nearest water well (Permit #7956 located approximately 2,800 feet southwest), lists a depth to groundwater of 60 feet. Therefore, I would like to update the Water resources section to reflect this.
- 4) 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."
- 5) 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.
- 6) 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 October 3, 2019. If you have any questions, please contact me.

**Doug Andrews**

Oil &amp; Gas Location Assessment Specialist - Northeast Colorado

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

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

Wed, Sep 4, 2019 at 2:39 PM

Hi Doug,

Please see my responses below in red.

**From:** Andrews - DNR, Doug <doug.andrews@state.co.us>  
**Sent:** Tuesday, September 03, 2019 1:37 PM  
**To:** VR Regulatory <Regulatory@VerdadOil.com>  
**Subject:** COGCC Form 2A review of Verdad Resources' Timbro 0101 location - Doc #402060001

Heather,

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

1) Verdad has included a comment indicating the Notice of WOGLA was submitted on 6/26/19 and that the Application will be submitted 28 days after the comment period, unless it is waived. Did Verdad end up submitting a WOGLA Application? If yes, please provide the date the WOGLA Application was submitted. **WOGLA application was submitted 07/30/2019.**

2) In the Land Use section Verdad has indicated the Land Use is Irrigated Cropland. However, a review of Location Pictures and aerial imagery does not appear to be typical of Irrigated Cropland. To me it appears to be Rangeland. Will you confirm the Land Use at this proposed Oil & Gas Location. If it is indeed Rangeland, please provide whether the identified plant species will come from the NRCS or was a field observation made. If a field observation was made, please provide the date of the observation. Also, which plant community does this proposed location cover; Disturbed Grassland, Native Grassland, or both? **Native Grassland, field observation 3/15/2018 – I have revised location drawing and photos attached.**

3) In the Water resources section Verdad has indicated the estimated depth to groundwater is 0 feet because the nearest water well does not report a groundwater depth. The next nearest water well (Permit #7956 located approximately 2,800 feet southwest), lists a depth to groundwater of 60 feet. Therefore, I would like to update the Water resources section to reflect this. **Yes please**

4) 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." **Verdad has no problem with this language**

5) 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**


6) 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." **Can we make this apply to just the tanks?**


Please respond to this correspondence by October 3, 2019. If you have any questions, please contact me.

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#### 2 attachments

 **F2A\_TIMBRO\_0101\_LOCATION\_DRAWING.pdf**  
5192K

 **F2A\_TIMBRO\_0101\_PHOTOS.pdf**  
698K

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

Thu, Sep 5, 2019 at 8:46 AM

Heather,

Since it seems Verdad has a concern with lining the containment area for the separators, will you provide a BMP for our consideration that details how Verdad will prevent or mitigate possible soil contamination from a spill or release from the separators?

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."* *Can we make this apply to just the tanks?*

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**VR Regulatory** <Regulatory@verdadoil.com>

Mon, Sep 9, 2019 at 10:37 AM

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

Hi Doug- will this work?

We build sufficiently impervious containment around the separators. Steel berms built into compacted roadbase. Sites are visited daily so a spill would be detected and cleaned up before any significant infiltration could occur. The berms would contain a spill from leaving the area around the separators.

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

**Sent:** Thursday, September 05, 2019 8:47 AM

**To:** VR Regulatory <Regulatory@VerdadOil.com>

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**VR Regulatory** <Regulatory@verdadoil.com>

Wed, Sep 11, 2019 at 3:38 PM

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

Hi Doug- I spoke with our EHS manager the road base is approximately 1-2 feet and it is sufficiently impervious per SPCC regulation to greatly minimize impact to the soil from any potential leak or drip from the separators. Sites are visited daily so a spill would be detected and cleaned up before any significant infiltration could occur. The berms would contain a spill from leaving the area around the separators. The volume of the potential leak from the separator is significantly less than that of a tank, so we prefer to treat them differently.

Heather Mitchell

Regulatory Manager

Verdad Resources

[HMitchell@verdadoil.com](mailto:HMitchell@verdadoil.com)

720-845-6917

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

**Sent:** Thursday, September 05, 2019 8:47 AM

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