

STATE OF
COLORADO

Christopher - DNR, Brian <brian.christopher@state.co.us>

Warner 10H-E165 Doc # 401779047 Form 2A Review

9 messages

Christopher - DNR, Brian <brian.christopher@state.co.us>

Tue, Oct 15, 2019 at 3:35 PM

To: toby.sachen@crestonepr.com, Rebecca Treitz - DNR <rebecca.treitz@state.co.us>

Ms. Sachen,

For the Oil and Gas Location Assessment process for the Warner 10H-E165 Location, Document # 401779047, I will need additional information:

1. Does Crestone Peak have a set of updated BMPs for this location? This can help address my questions 2-7.
2. For BMP #2, stormwater runoff control, please provide a new, site-specific BMP for managing stormwater runoff specifically from this location and provide us with a replacement BMP.
3. BMP #3, as the COGCC does not permit the SPCC or CDPHE stormwater plans, please revise BMP #3 with site-specific language and provide us with the replacement BMP.
4. BMP #6, tank berms. Do these metal berms and liner described also apply to separators? Please update and provide us with the replacement BMP.
5. BMP #9, MLVT. Please include the vendor, size, and duration the MLVT will be on location and provide us with the replacement BMP.
6. BMP #10, noise mitigation. Please provide us with a site-specific BMP stating what and where noise mitigation will be installed at the location.
7. BMP #13, odor mitigation. Please revise the BMP to include the site-specific chemical additives, specific steps taken to minimize odors, and what direction the engine exhaust will be directed. Please provide us with the replacement BMP.
8. The Form 2A states that the right to construct is due to a lease, but the check boxes say that the surface owner is the mineral owner but the checkbox saying that they have signed the Oil and Gas Lease is not checked. Please advise.
9. The location photos do not show the horizon or area surrounding the location. Please submit an additional attachment with location photos (as the original was during growing season, having new photographs of this location outside of growing season to show the surrounding area is acceptable).
10. I will need additional information on the buildings approximately 700 ft. south of the location to determine if they qualify as building units per the 100 series definitions. This can potentially include commercial facilities and warehouses, triggering additional Director's Objective Criteria 1 scrutiny.
11. This location meets the Director's Objective Criteria 1, proximity to building unit, as measured from the edge of the disturbed Oil and Gas Location.
12. This location meets the Director's Objective Criteria 3, proximity to a municipal boundary, as measured from the edge of the disturbed Oil and Gas Location.
13. This location meets the Director's Objective Criteria 5.c., a Sensitive Area for water resources, with an estimated depth to groundwater of 10 ft.

Please provide me with this additional information within the next 30 days.

Please contact me with any questions.

Thank you,

Brian Christopher
Oil & Gas Location Assessment Specialist

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

P 303.894.2100 x5271

1120 Lincoln Street, Suite 801, Denver, CO 80203

Brian.Christopher@state.co.us | www.colorado.gov/cogcc

Toby Sachen (Contractor) <tooby.sachen.contractor@crestonepr.com>
To: Brian Christopher - DNR <brian.christopher@state.co.us>

Tue, Oct 15, 2019 at 5:24 PM

Hi Brian,

I am starting to address your questions. Items 5 and 8 are addressed below in red. I am looking into the BMPs as well and have made some other requests also noted in red below.

Re: Item 3 – BMP #3 is a flowline BMP not stormwater. Can you please clarify the question?

Thank you and I will be in contact.

Toby

From: Christopher - DNR, Brian <brian.christopher@state.co.us>

Sent: Tuesday, October 15, 2019 3:35 PM

To: Toby Sachen (Contractor) <tooby.sachen.contractor@CRESTONEPR.COM>; Rebecca Treitz - DNR <rebecca.treitz@state.co.us>

Subject: [EXT]Warner 10H-E165 Doc # 401779047 Form 2A Review

Ms. Sachen,

For the Oil and Gas Location Assessment process for the Warner 10H-E165 Location, Document # 401779047, I will need additional information:

1. Does Crestone Peak have a set of updated BMPs for this location? This can help address my questions 2-7.
2. For BMP #2, stormwater runoff control, please provide a new, site-specific BMP for managing stormwater runoff specifically from this location and provide us with a replacement BMP.
3. BMP #3, as the COGCC does not permit the SPCC or CDPHE stormwater plans, please revise BMP #3 with site-specific language and provide us with the replacement BMP. #3 is a flowline BMP, not stormwater. Not sure what is being asked.
4. BMP #6, tank berms. Do these metal berms and liner described also apply to separators? Please update and provide us with the replacement BMP. Made information request to Process Engineer.
5. BMP #9, MLVT. Please include the vendor, size, and duration the MLVT will be on location and provide us with the replacement BMP. This information is included in the comment where we have typically supplied it. Please add this to the MLVT BMP (and remove from the comments if that is how you want to handle it):

A temporary completions area of approximately four acres will be utilized for 2 fresh water storage tanks to be used during completions operations. The state-licensed manufacturer for the subject site will either be MWS or Pinnacle Manufacturing. The tanks will hold between 40,000-42,000 barrels, are between 153'-158' in diameter, and plan to be on location for 91 days. Once completions operations are complete, this area will be completely reclaimed. Crestone certifies that the MLVTs are designed and implemented consistent with the June 13, 2014 "Policy on the Use of Modular Large Volume Tanks in Colorado." Please see attached map for the location of the tanks

6. BMP #10, noise mitigation. Please provide us with a site-specific BMP stating what and where noise mitigation will be installed at the location.
7. BMP #13, odor mitigation. Please revise the BMP to include the site-specific chemical additives, specific steps taken to minimize odors, and what direction the engine exhaust will be directed. Please provide us with the replacement BMP.
8. The Form 2A states that the right to construct is due to a lease, but the check boxes say that the surface owner is the mineral owner but the checkbox saying that they have signed the Oil and Gas Lease is not checked. Please advise. **Yes, the owners are bound by a lease they did not sign themselves.**
9. The location photos do not show the horizon or area surrounding the location. Please submit an additional attachment with location photos (as the original was during growing season, having new photographs of this location outside of growing season to show the surrounding area is acceptable). **I requested Surface Land retake these.**
10. I will need additional information on the buildings approximately 700 ft. south of the location to determine if they qualify as building units per the 100 series definitions. This can potentially include commercial facilities and warehouses, triggering additional Director's Objective Criteria 1 scrutiny. **I believe these are unoccupied and do not qualify as building units, but I asked Surface Land to confirm.**

[Quoted text hidden]

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: "Toby Sachen (Contractor)" <toby.sachen.contractor@crestonepr.com>
Cc: megan.cambell@crestonepr.com

Thu, Oct 24, 2019 at 12:53 PM

Toby and Meghan,

I am responding to this to keep this chain of communication open. My questions #3, #5, and #8 are settled. For my question #10, the fact that the building approximately 700 ft. south of the location is 13,000 sq. ft. does keep it below the threshold of a building unit for a warehouse. But please keep me in the loop for whatever Surface Land learns about the structures there.

Please let me know if you have any questions.

Brian Christopher
Oil & Gas Location Assessment Specialist



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Department of Natural Resources

P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Mail Delivery System <MAILER-DAEMON@state.co.us>
To: brian.christopher@state.co.us

Thu, Oct 24, 2019 at 12:53 PM

This is the mail system at host state.co.us.

I'm sorry to have to inform you that your message could not be delivered to one or more recipients. It's attached below.

For further assistance, please send mail to postmaster.

If you do so, please include this problem report. You can delete your own text from the attached returned message.

The mail system

<meghan.cambell@crestonepr.com>: host
crestonepr-com.mail.protection.outlook.com[104.47.50.36] said: 550 5.4.1
Recipient address rejected: Access denied
[BY2NAM05FT035.eop-nam05.prod.protection.outlook.com] (in reply to RCPT TO
command)

Final-Recipient: rfc822; meghan.cambell@crestonepr.com
Original-Recipient: rfc822;meghan.cambell@crestonepr.com
Action: failed
Status: 5.4.1
Remote-MTA: dns; crestonepr-com.mail.protection.outlook.com
Diagnostic-Code: smtp; 550 5.4.1 Recipient address rejected: Access denied
[BY2NAM05FT035.eop-nam05.prod.protection.outlook.com]

 **noname**
4K

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: "Toby Sachen (Contractor)" <toby.sachen.contractor@crestonepr.com>
Cc: meghan.cambell@crestonepr.com

Thu, Oct 24, 2019 at 12:57 PM

Re-sending to correct email address.

Brian Christopher
Oil & Gas Location Assessment Specialist



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P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Toby Sachen (Contractor) <toby.sachen.contractor@crestonepr.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "meghan.cambell@crestonepr.com" <meghan.cambell@crestonepr.com>

Thu, Oct 24, 2019 at 1:11 PM

Hi Brian,
I am out of town and heading home this afternoon. I will respond tomorrow
Thx
Toby

Sent from my iPhone

On Oct 24, 2019, at 2:54 PM, Christopher - DNR, Brian <brian.christopher@state.co.us> wrote:

[Quoted text hidden]

Meghan Campbell <meghan.campbell@crestonepr.com>

Fri, Oct 25, 2019 at 11:51 AM

To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>, "Toby Sachen (Contractor)" <toby.sachen.contractor@crestonepr.com>

Hi Brian,

Thank you for sending this. We should be able to get back to you shortly on all of your questions.

Thanks,

Meghan Campbell

Senior Regulatory Analyst

(720) 410-8487



[Quoted text hidden]

Toby Sachen (Contractor) <toby.sachen.contractor@crestonepr.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: Meghan Campbell <meghan.campbell@crestonepr.com>

Fri, Oct 25, 2019 at 3:15 PM

Hi Brian,

Please see my responses in red below.

Thank you for your patience.

Toby

From: Christopher - DNR, Brian <brian.christopher@state.co.us>

Sent: Tuesday, October 15, 2019 3:35 PM

To: Toby Sachen (Contractor) <toby.sachen.contractor@CRESTONEPR.COM>; Rebecca Treitz - DNR <rebecca.treitz@state.co.us>

Subject: [EXT]Warner 10H-E165 Doc # 401779047 Form 2A Review

Ms. Sachen,

For the Oil and Gas Location Assessment process for the Warner 10H-E165 Location, Document # 401779047, I will need additional information:

1. Does Crestone Peak have a set of updated BMPs for this location? This can help address my questions 2-7.
2. For BMP #2, stormwater runoff control, please provide a new, site-specific BMP for managing stormwater runoff specifically from this location and provide us with a replacement BMP. **Note: I added the specifics in a sentence to the end of the original BMP. Also, please see attached grading plan for your information.**

Crestone will comply with COGCC Rule 1002.f.(2). by utilizing BMPs at the oil and gas location to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, site degradation and protects surface waters. Examples of engineering controls that could be used when needed are:

Surface roughening

Silt fence

Erosion control blanket

Temporary slope drain

Temporary outlet protection

Sediment control log

Vehicle tracking control

Sediment trap

Stabilized staging area

Specific to this site will be sediment traps on all four corners of the pad and a diversion ditch around the perimeter of the pad.

3. BMP #3, as the COGCC does not permit the SPCC or CDPHE stormwater plans, please revise BMP #3 with site-specific language and provide us with the replacement BMP. **Settled**
4. BMP #6, tank berms. Do these metal berms and liner described also apply to separators? Please update and provide us with the replacement BMP. **Crestone does not typically put an impervious layer under the separators, but we do put a 22" metal berm around them.**
5. BMP #9, MLVT. Please include the vendor, size, and duration the MLVT will be on location and provide us with the replacement BMP. **Settled.**
6. BMP #10, noise mitigation. Please provide us with a site-specific BMP stating what and where noise mitigation will be installed at the location. **Please change "Crestone will install temporary sound walls..." to "Crestone will install temporary sound walls in all four directions..."**
7. BMP #13, odor mitigation. Please revise the BMP to include the site-specific chemical additives, specific steps taken to minimize odors, and what direction the engine exhaust will be directed. Please provide us with the replacement BMP.

Where possible, drilling rig and completion equipment engine exhaust will be directed away from occupied buildings to assist in mitigating potential odors. As necessary, Crestone may utilize chemical additives during drilling operations to mitigate odor impacts. To mitigate the effects of odor from Crestone's operations, Crestone will employ only International Association of Oil & Gas Producers (IOGP) Group III drilling base fluids with <0.5 weight % aromatics and will not use drilling fluids based on diesel. We also employ the use of mud chillers. Sealed tanks with pressure relief valves and emissions controls will be utilized for the production facilities.

8. The Form 2A states that the right to construct is due to a lease, but the check boxes say that the surface owner is the mineral owner but the checkbox saying that they have signed the Oil and Gas Lease is not checked. Please advise. **Settled.**

9. The location photos do not show the horizon or area surrounding the location. Please submit an additional attachment with location photos (as the original was during growing season, having new photographs of this location outside of growing season to show the surrounding area is acceptable). **New photos are attached.**

10. I will need additional information on the buildings approximately 700 ft. south of the location to determine if they qualify as building units per the 100 series definitions. This can potentially include commercial facilities and warehouses, triggering additional Director's Objective Criteria 1 scrutiny. **Building is below the minimum square footage to be considered a warehouse/BU.**

[Quoted text hidden]

2 attachments**Warner 10H-E165 Location Photos.pdf**

596K

**Warner 10H-E165 1N65W10 Grading Plan.pdf**

836K

Toby Sachen (Contractor) <toby.sachen.contractor@crestonepr.com>

Fri, Oct 25, 2019 at 3:22 PM

To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Cc: Meghan Campbell <meghan.campbell@crestonepr.com>

Brian,

Sorry. I added another sentence to #2. See below.

Thanks and have a good weekend.

Toby

From: Toby Sachen (Contractor)**Sent:** Friday, October 25, 2019 3:15 PM**To:** Christopher - DNR, Brian <brian.christopher@state.co.us>**Cc:** Meghan Campbell <meghan.campbell@crestonepr.com>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Specific to this site will be sediment traps on all four corners of the pad and a diversion ditch around the perimeter of the pad. All slopes will be roughened and there will be vehicle tracking at all entrances.

[Quoted text hidden]

2 attachments**Warner 10H-E165 Location Photos.pdf**

596K

**Warner 10H-E165 1N65W10 Grading Plan.pdf**

836K