



RE: 402052168 Verdad Fiscus Fed 2627 Form 2A Technical Review

8 messages

Hix - DNR, James <james.hix@state.co.us>
To: regulatory@verdadoil.com
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>

Thu, Nov 7, 2019 at 12:53 PM

Hi Heather,

While conducting the technical review on the Form 2A (Doc # 402052168) for the Fiscus Federal 2627, the COGCC OGLA team had some questions and requests additional information.

- 1) *Construction, Drilling & Waste* Tab - Verdad indicates that oil based drilling fluids will be used, and that drilling wastes will be disposed offsite at a commercial facility. The *Submit* Tab indicates disposal of water based cuttings via a Land Application facility. This is the first time Verdad has indicated they will permit a Land Application (LAP) facility. Please confirm if this is still the case. If so Verdad will need to provide a Waste Management Plan for this 2A, that discusses the separate management of both OBM and water based fluids/cuttings. The timing of this, assuming construction will start in January 2020, needs to be concurrent with the 2A. Please provide the Form 4 LAP Sundry now so we can properly indicate this on the 2A. We may elect to HOLD this 2A until the LAP Sundry has been submitted if E&P waste is not disposed at a commercial facility.
- 2) *Water Resources* Tab - 2A Verdad indicates that this is not a sensitive area; however, ground water depth is listed at 15 feet which is for the USFS windmill located 6,500 feet to the southeast. This well is at an elevation that is 85 feet lower than the Location. Therefore, based on that and other water well information the depth to ground water may be more than 70 feet bgs. Ground water at 20 feet or less is a sensitive area criteria. Does Verdad concur on revising the estimated depth to ground water? If you concur this means that it is not a sensitive area and will eliminate Objective Criteria 5.c from being met and may eliminate Director review.
- 3) *Soil and Plant Community* Tab - From aerials and Location Pictures the correct Land Use appears to be Rangeland. Does Verdad concur with changing the Land Use to non-cropland / Rangeland? If so please provide all of the Plant Community tab answers that apply.
- 5) *Operator BMP/COA* Tab - The Mud Control BMP needs to be clarified. Does Verdad concur with changing it to this one on the Timbro 3131 Form 2A: "*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 or 2-inch to 4-inch stone, will still be required during production operations.*"?
- 6) *Operator BMP/COA* Tab - For the Stormwater BMP, please provide a list of the typical stormwater BMPs that Verdad may use.
- 7) *Operator BMP/COA* Tab For the Noise BMP - There are no homes within 1-mile, so will straw bale/ sound walls really be built? If yes, where will they be located on the pad?

James

--
James Hix

Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5181 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
james.hix@state.co.us | www.colorado.gov/cogcc

VR Regulatory <Regulatory@verdadresources.com>
To: "Hix - DNR, James" <james.hix@state.co.us>; VR Regulatory <Regulatory@verdadresources.com>
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>

Thu, Nov 7, 2019 at 2:50 PM

Hi James- see my responses below in red. Thanks for the review. This is one we are wanting to get through!

Let me know if you need anything further.

Thanks,

Heather Mitchell

Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

From: Hix - DNR, James <james.hix@state.co.us>
Sent: Thursday, November 07, 2019 12:54 PM
To: VR Regulatory <Regulatory@VerdadResources.com>
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>
Subject: RE: 402052168 Verdad Fiscus Fed 2627 Form 2A Technical Review

Hi Heather,

While conducting the technical review on the Form 2A (Doc # 402052168) for the Fiscus Federal 2627, the COGCC OGLA team had some questions and requests additional information.

- 1) *Construction, Drilling & Waste* Tab - Verdad indicates that oil based drilling fluids will be used, and that drilling wastes will be disposed offsite at a commercial facility. The *Submit* Tab indicates disposal of water based cuttings via a Land Application facility. This is the first time Verdad has indicated they will permit a Land Application (LAP) facility. Please confirm if this is still the case. If so Verdad will need to provide a Waste Management Plan for this 2A, that discusses the separate management of both OBM and water based fluids/cuttings. The timing of this, assuming construction will start in January 2020, needs to be concurrent with the 2A. Please provide the Form 4 LAP Sundry now so we can properly indicate this on the 2A. We may elect to HOLD this 2A until the LAP Sundry has been submitted if E&P waste is not disposed at a commercial facility.

That language should be removed from the submit tab. We will dispose off site. I have attached our waste management plan which is consistent with this as well.

- 2) *Water Resources* Tab - 2A Verdad indicates that this is not a sensitive area; however, ground water depth is listed at 15 feet which is for the USFS windmill located 6,500 feet to the southeast. This well is at an elevation that is 85 feet lower than the Location. Therefore, based on that and other water well information the depth to ground water may be more than 70 feet bgs. Ground water at 20 feet or less is a sensitive area criteria. Does Verdad concur on revising the estimated depth to ground water? **Yes, Verdad concurs** If you concur this means that it is not a sensitive area and will eliminate Objective Criteria 5.c from being met and may eliminate Director review. **Great**

- 3) *Soil and Plant Community* Tab - From aerials and Location Pictures the correct Land Use appears to be Rangeland. Does Verdad concur with changing the Land Use to non-cropland / Rangeland? If so please provide all of the Plant Community tab answers that apply. **Please check disturbed grasslands and native grasslands.**

- 5) *Operator BMP/COA* Tab - The Mud Control BMP needs to be clarified. Does Verdad concur with changing it to this one on the Timbro 3131 Form 2A: "*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 or 2-inch to 4-inch stone, will still be required during production operations.*"? **Yes, Verdad concurs.**

- 6) *Operator BMP/COA* Tab - For the Stormwater BMP, please provide a list of the typical stormwater BMPs that Verdad may use.

The location will have stormwater control measures consisting of a berm around the perimeter of the location to divert clean water away from disturbed areas and to divert onsite runoff into a sediment trap, a ditch around the location to collect and divert runoff to a sediment trap, and two to four sediment traps to allow sediment to settle out of diverted stormwater runoff. Sediment trap spill way will use rip-rap, aggregate and/or

wattles to further filter runoff. These control measures will be inspected at the following frequencies: or 2-inch to 4-inch stone. Storm water controls are inspected every 14 days during construction, drilling and completions.

Once per month after that, until interim reclamation is completely established (approximately 2 years). Once per year after that until facility abandoned.

7) Operator BMP/COA Tab For the Noise BMP - There are no homes within 1-mile, so will straw bale/ sound walls really be built? If yes, where will they be located on the pad?

No we will not - please remove.

James

[Quoted text hidden]

 **VR WMP 10.09.19.pdf**
55K

Hix - DNR, James <james.hix@state.co.us>
To: VR Regulatory <Regulatory@verdadresources.com>
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>

Thu, Nov 7, 2019 at 4:07 PM

Thanks Heather,
I have made the changes we discussed and added the information that you provided to the Form 2A. I think that I have what I need now to complete the technical review and move it to the next step. Thank you for your quick response.

James

[Quoted text hidden]

VR Regulatory <Regulatory@verdadresources.com>
To: "Hix - DNR, James" <james.hix@state.co.us>, VR Regulatory <Regulatory@verdadresources.com>
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>

Wed, Nov 27, 2019 at 9:25 AM

Good Morning- on this location Weld county is making us increase the disturbance for drainage. I will get some updated drawings to submit. Everything else should remain the same, but this is an issue we are encountering. I am sure we are not the only ones.

[Quoted text hidden]

VR Regulatory <Regulatory@verdadresources.com>
To: "Hix - DNR, James" <james.hix@state.co.us>, VR Regulatory <Regulatory@verdadresources.com>
Cc: Doug Andrews - DNR <doug.andrews@state.co.us>

Mon, Dec 2, 2019 at 7:56 AM

Due to Weld asking for drainage plans on all pads, Verdad had to increase the size of our disturbance on this pad. Please see the attached revision to the location drawing.

Please let me know if you have any questions.

[Quoted text hidden]

 **F2A_FISCUS_2627_LOCATION_DRAWING_REV1.pdf**
5068K

Hix - DNR, James <james.hix@state.co.us>
To: Doug Andrews - DNR <doug.andrews@state.co.us>

Mon, Dec 2, 2019 at 8:49 AM

Doug,
Verdad had to increase the size of the disturbance on the Fiscus Federal 2627 well pad due to Weld County asking for drainage plans on all pads. They have included a revision to the Location drawing. I can review the original Location drawing compared to this and respond back to Heather to let her know if it looks good.

James

[Quoted text hidden]

 **F2A_FISCUS_2627_LOCATION_DRAWING_REV1.pdf**
5068K

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

Tue, Dec 3, 2019 at 9:31 AM

James,

Please be sure to update the Form 2A where it asks for the size of the disturbance are both during construction and after interim reclamation. Some of the other attachments may need to be revised as well to reflect the increased disturbance area (e.g. the Hydrology Map). Also, does this increased disturbance area now result in any Objective Criteria being met that weren't before?

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



303.894.2100 Ext. 5180

1120 Lincoln St., Suite 801, Denver, CO 80203

doug.andrews@state.co.us | <http://coGCC.state.co.us/>

[Quoted text hidden]

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

Tue, Dec 3, 2019 at 10:46 AM

Thanks Doug,
I will do that. I don't think that it will change much for this particular site since it is a remote Location near New Raymer; however, I will check.

James

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