



RE: [EXTERNAL] :RE: Potential Odor Complaints with Group I Oil Based Drilling Fluids

1 message

Venessa Chase <Venessa.Chase@pdce.com>

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

Cc: John Noto - DNR <john.noto@state.co.us>, Doug Andrews - DNR <doug.andrews@state.co.us>


Wed, Dec 4, 2019 at 3:03 PM

PDC would be more comfortable with clarity regarding switching the OBM for the next well on the pad, not immediately while still drilling. We would like to propose the following:

In the event odors are detected offsite by COGCC Staff during routine inspection, or confirmed offsite by COGCC Staff investigating a complaint, the Director may require the Operator to cease the use of Group I oil based drilling fluid and on the subsequent well the Operator shall switch to Group II oil based drilling fluid combined with the use of an odor neutralizer or switch to Group III oil based drilling fluids (such as NeoFlo or equivalent) prior to initiating future drilling on the well pad.

Please let me know your thoughts.

Thanks!

 Venessa Chase | Regulatory Supervisor (Wattenberg) | PDC Energy |

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From: Hix - DNR, James <james.hix@state.co.us>

Sent: Wednesday, December 4, 2019 12:21 PM

To: Venessa Chase <Venessa.Chase@pdce.com>

Cc: John Noto - DNR <john.noto@state.co.us>; Doug Andrews - DNR <doug.andrews@state.co.us>

Subject: [EXTERNAL] :RE: Potential Odor Complaints with Group I Oil Based Drilling Fluids

Hi Venessa,

As mentioned in our telephone conversation, the COGCC is concerned with the use of Group I oil based drilling fluids and potential odor complaints from BU occupants within buffer zones. The COGCC has received complaints about other operators using Group I drilling fluids in other areas, and the number of complaints have decreased or ceased when the operator switched to Group II oil based drilling fluids used with odor neutralizers or when they switched to Group III oil based drilling fluids.

The COGCC is considering attaching a COA to Locations where Group I oil based drilling fluids are to be used while drilling within buffer zones. The COA could be attached to multiple well Locations in buffer zones or where there is a high density of BUs. The Draft COA language being considered is as follows:

In the event odors are detected offsite by COGCC Staff during routine inspection, or confirmed offsite by COGCC Staff investigating a complaint, the Director may require the Operator to cease the use of Group I oil based drilling fluid and immediately switch to Group II oil based drilling fluid combined with the use of an odor neutralizer or switch to Group III oil based drilling fluids (such as NeoFlo or equivalent) prior to initiating future drilling on the well pad.

Since this COA has the potential to significantly impact drilling operations, we are providing you an opportunity to review this COA language with your staff to determine if there are other ways to address odor issues or avoid odor complaints.

James

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James Hix

Oil & Gas Location Assessment Specialist



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