

State of Colorado  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
402220441  
**(RE-SUBMITTED)**

Date Received:  
12/16/2019

**APPLICATION FOR PERMIT TO:**

☒ Drill ☐ Deepen ☐ Re-enter ☐ Recomplete and Operate

TYPE OF WELL OIL ☒ GAS ☐ COALBED ☐ OTHER: \_\_\_\_\_ Refilling ☒  
ZONE TYPE SINGLE ZONE ☒ MULTIPLE ZONES ☐ COMMINGLE ZONES ☐ Sidetrack ☐

Well Name: Buford Well Number: 33-6-2L  
Name of Operator: CONFLUENCE DJ LLC COGCC Operator Number: 10518  
Address: 1001 17TH STREET #1250  
City: DENVER State: CO Zip: 80202  
Contact Name: Brittany Rothe Phone: (303)226-9519 Fax: ( )  
Email: brothe@confluencelp.com

**RECLAMATION FINANCIAL ASSURANCE**

Plugging and Abandonment Bond Surety ID: 20160056

**WELL LOCATION INFORMATION**

QtrQtr: SWSW Sec: 33 Twp: 1N Rng: 65W Meridian: 6  
Latitude: 40.003240 Longitude: -104.676810  
Footage at Surface: 985 Feet FNL/FSL FSL 450 Feet FEL/FWL FWL  
Field Name: WATTENBERG Field Number: 90750  
Ground Elevation: 5081 County: WELD  
GPS Data:  
Date of Measurement: 05/03/2017 PDOP Reading: 1.2 Instrument Operator's Name: Kyle Daley  
If well is ☐ Directional ☒ Horizontal (highly deviated) **submit deviated drilling plan.**  
Footage at Top of Prod Zone: FNL/FSL 470 FSL 2352 FWL 470 FNL 2352 FWL  
Sec: 33 Twp: 1N Rng: 65W Sec: 28 Twp: 1N Rng: 65W

**LOCAL GOVERNMENT INFORMATION**

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition below. ☒ Yes ☐ No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location. ☒

The local government siting permit type is: 1041 WOGLA

The local government siting permit was filed on: 09/06/2017

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

This WOGLA was approved on 10/03/17.

## LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT

Surface Ownership: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Surface Owner is: ☐ is the mineral owner beneath the location.

(check all that apply)

☐ is committed to an Oil and Gas Lease.

☐ has signed the Oil and Gas Lease.

☐ is the applicant.

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes

The right to construct the Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

## LEASE INFORMATION

Using standard QtrQtr, Sec, Twp, Rng format, describe one entire mineral lease that will be produced by this well (Describe lease beneath surface location if produced. Attach separate description page or map if necessary.)

T1N-R65W Section 33: All

Total Acres in Described Lease: 640 Described Mineral Lease is: ☒ Fee ☐ State ☐ Federal ☐ Indian

Federal or State Lease # \_\_\_\_\_

Distance from Completed Portion of Wellbore to Nearest Lease Line of described lease: 0 Feet

## CULTURAL DISTANCE INFORMATION

Distance to nearest:

Building: 1852 Feet

Building Unit: 2191 Feet

High Occupancy Building Unit: 5280 Feet

Designated Outside Activity Area: 5280 Feet

Public Road: 969 Feet

Above Ground Utility: 516 Feet

Railroad: 5280 Feet

Property Line: 450 Feet

School Facility: 5280 Feet

School Property Line: 5280 Feet

Child Care Center: 5280 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of the Proposed Well to nearest of each cultural feature as described in Rule 303.a.(5).
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: ☐ Buffer Zone  
☐ Exception Zone  
☐ Urban Mitigation Area

- Buffer Zone – as described in Rule 604.a.(2), within 1,000' of a Building Unit  
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.  
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: \_\_\_\_\_

## SPACING and UNIT INFORMATION

Distance from completed portion of proposed wellbore to nearest completed portion of offset wellbore permitted or completed in the same formation: 285 Feet

Distance from Completed Portion of Wellbore to Nearest Unit Boundary 470 Feet (Enter 5280 for distance greater than 1 mile.)

Federal or State Unit Name (if appl): \_\_\_\_\_ Unit Number: \_\_\_\_\_

## SPACING & FORMATIONS COMMENTS

T1N R65W Section 28 & 33: All

If this Form 2 is associated with a Drilling and Spacing Unit application, provide docket number: \_\_\_\_\_

## OBJECTIVE FORMATIONS

Objective Formation(s)	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
NIOBRARA	NBRR	407-2173	1280	S. 28 & 33: All

## DRILLING PROGRAM

Proposed Total Measured Depth: 17711 Feet

Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:

Enter distance if less than or equal to 1,500 feet: 612 Feet ☐ No well belonging to another operator within 1,500 feet

Will a closed-loop drilling system be used? Yes

Is H<sub>2</sub>S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No (If Yes, attach an H<sub>2</sub>S Drilling Operations Plan)

Will salt sections be encountered during drilling? No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

BOP Equipment Type: ☒ Annular Preventor ☒ Double Ram ☒ Rotating Head ☐ None

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal

Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? \_\_\_\_\_

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

## CASING PROGRAM

Casing Type	Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CONDUCTOR	26	16	43	0	80	400	80	0
SURF	13+1/2	9+5/8	36	0	1500	878	1500	0
1ST	8+1/2	5+1/2	20	0	17711	1927	17711	2500

☐ Conductor Casing is NOT planned

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## GREATER WATTENBERG AREA LOCATION EXCEPTIONS

Check all that apply:

- ☒ Rule 318A.a. Exception Location (GWA Windows).
- ☒ Rule 318A.c. Exception Location (GWA Twinning).

## RULE 502.b VARIANCE REQUEST

- ☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

## OTHER LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 318.c. Exception Location from Rule or Spacing Order Number \_\_\_\_\_
- ☐ Rule 603.a.(2) Exception Location (Property Line Setback).

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments Distance from completed portion of the wellbore to nearest wellbore permitted or completed well in the same formation and within the unit was measured to the permitted Buford 33-6-4L measured in 2-D.

The distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells was measured to the PA'd GlenYoung 2 in 2-D separation.

Changes to this well are: landing point, bottom hole, casing and cement program.

Exception Location waivers are located in the Surface Use Agreement on page 2, section 5.

The oil and gas location has been built and has producing wells on it.

A form 4 was submitted updating the Best Management Practices (BMP's), the document number for that form 4 is: 402260350

This application is in a Comprehensive Drilling Plan No CDP #: \_\_\_\_\_

Location ID: 452048

Is this application being submitted with an Oil and Gas Location Assessment application? No

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: \_\_\_\_\_

Print Name: Andrea GrossTitle: Permit AgentDate: 12/16/2019Email: agross@upstreampm.com

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: \_\_\_\_\_

Director of COGCC

Date: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

**API NUMBER**

05 123 45538 00

### Conditions Of Approval

All representations, stipulations and conditions of approval stated in the Form 2A for this location shall constitute representations, stipulations and conditions of approval for this Form 2 Permit-to-Drill and are enforceable to the same extent as all other representations, stipulations and conditions of approval stated in this Permit-to-Drill.

**COA Type****Description**

### Best Management Practices

**No BMP/COA Type****Description**

1	Drilling/Completion Operations	Logging: The Buford 33-9-3L, API No. 05-123-45544, well drilled on the pad was logged with an open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run. The Buford 33-9-3L, API No. 05-123-45544, is the well in which open-hole logs were run.
2	Drilling/Completion Operations	Anti-collision: Operator will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice shall be given to all offset operators prior to drilling.
3	Drilling/Completion Operations	Bradenhead Monitoring: Operator acknowledges and will comply with COGCC Policy for Braden-head Monitoring during Hydraulic Fracturing Treatments in the Greater Wattenberg Area dated May 29, 2012.

Total: 3 comment(s)

### Applicable Policies and Notices to Operators

Notice Concerning Operating Requirements for Wildlife Protection.  
[http://cogcc.state.co.us/documents/reg/Policies/Wildlife\\_Notice.pdf](http://cogcc.state.co.us/documents/reg/Policies/Wildlife_Notice.pdf)

### Attachment Check List

**Att Doc Num****Name**

402220441	FORM 2 RESUBMITTED
402260250	FORM 2 REJECTED

402261478	OffsetWellEvaluations Data
402261494	DIRECTIONAL DATA
402261496	DEVIATED DRILLING PLAN
402261497	WELL LOCATION PLAT
402261499	SURFACE AGRMT/SURETY
402272542	EXCEPTION LOC REQUEST

Total Attach: 8 Files



## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Returned to draft: •The attached exception location request has an incorrect document number for the Buford 33-7-1L. The document number must be corrected prior to the determination of completeness.	12/26/2019
Permit (Rejected)	<p>This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is rejecting this application consistent with the Rejection Process – Form 2 and 2A (May 21, 2019) posted in the Form 2 and Form 2A Instructions section of our website. In compliance with § 24-65.1-108(1), C.R.S., the COGCC is returning this application to the applicant to remedy the deficiencies. The applicant may resubmit this application for COGCC review; upon determination of completeness for any resubmitted application, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review.</p> <p>In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary prior to determination of completeness:</p> <ol style="list-style-type: none"> <li>1. This Form 2 application meets one or more Objective Criteria. This application will not be determined to be complete until the applicant addresses the Objective Criteria on a Form 4 Sundry Notice submitted to the related Location ID. The Form 4 document number shall be provided in the Operator Submit Comments. The Form 4 shall include updated Best Management Practices to address the following: <ol style="list-style-type: none"> <li>a. Lighting: BMP needs to be updated to describe what light pollution mitigation will be used on location.</li> <li>b. Fencing: BMP needs to be updated to describe the fencing plan that was agreed upon with the surface owner.</li> <li>c. Trash Removal: BMP needs to be updated to add affirmative language committing to trash removal.</li> <li>d. StormWater/Erosion Control: BMP needs to be updated to better describe the site-specific stormwater controls will be implemented with good engineering practices.</li> <li>e. Berm Construction: BMP needs to be updated to include a description of the liner to be used in the tank containment area and include a description of the containment (berm and liner) for the separator area.</li> <li>f. Noise Mitigation: BMP needs to be updated to better describe the hay bales planned for this location (how many sides? how tall?).</li> <li>g. Green Completions: BMP needs to be updated to the current standard Green Completions BMP language.</li> <li>h. A BMP is needed to describe the Remote Monitoring and Shut-In system that will be used on this location.</li> </ol> </li> <li>2. The Logging BMP references a well that is more than 25 miles away. This BMP does not satisfy the Alternative Logging Program requirements for Rule 317.p. A different offset well must be identified to use this Alternative Logging Program BMP.</li> <li>3. The attached exception location request cites Rule 318A.c. incorrectly and has an incorrect document number for the Buford 33-7-1L. The document number must be corrected and Rule 318A.c must be cited correctly.</li> <li>4. The Well Name &amp; Contact tab is missing a response to the “Commingle Zones” field.</li> </ol>	12/11/2019
Permit	<ul style="list-style-type: none"> <li>•The Well location tab is missing a response to commingle zones question.</li> <li>•The Logging BMP references a well that is more than 25 miles away. This well does not satisfy Rule 317.p. A different BMP should be used.</li> <li>•The attached exception location request cites Rule 318A.c. incorrectly and has an incorrect document number for the Buford 33-7-1L.</li> </ul>	11/15/2019
Permit	Passed completeness.	11/01/2019
Permit	Date of Measurement does not match Well Location Plat. Return to draft.	11/01/2019

Total: 5 comment(s)

## Public Comments

No public comments were received on this application during the comment period.

**RE-SUBMITTED**