

STATE OF
COLORADO

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

COGCC Form 2A review of Verdad Resources Timbro Fed 1931 location - Form 2A Doc #402254036)

2 messages

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

Mon, Jan 6, 2020 at 3:11 PM

Heather,

I have reviewed the referenced Form 2A and have the following comments.

- 1) Verdad has provided a Planning BMP indicating "*Verdad has submitted a WOGLA application with Weld county...*" Please provide me with the date the WOGLA was submitted to Weld County and I will add that to the Local Government section.
- 2) A review of the Location Drawing indicates two VRTs and one Heater Treater. The Facilities section does not list any VRTs and two Heater Treaters. Please confirm the count of VRTs and Heater Treaters and, if necessary, revise the Location Drawing.
- 3) The Location Drawing depicts 0.56 acres of topsoil immediately west of the pad. Is this topsoil pile currently present or is it where Verdad plans to stage the topsoil from this location? Based on the Location Pictures it does not appear to be currently present. If it is where Verdad plans to stage the topsoil from this location, is this 0.56 acres included in the acreage size of the disturbed area/location indicated on the Form 2A? If this topsoil pile is for this location, then please update the Location Drawing to indicate it is part of the disturbed area.
- 4) In the Future Land Use Verdad has indicated both Improved Pasture and Rangeland. Given the general land use for this area, I suspect the Surface Owner is not going to plant and grow improved forage for their livestock where this locations is. I suspect Rangeland is the likely planned Future Land Use. Please confirm.
- 5) In the Water Resources section Verdad has indicated the estimated depth to groundwater is 156 feet based on water well Permit #98770. A review of this water well indicates 156 feet is the total depth and the reported static water level is 90 feet. Therefore, I would like to change the estimated depth to groundwater from 156 feet to 90 feet.
- 6) Verdad has indicated they will have upto 16 tanks on this location. Please tell me the size of these storage tanks as this may result in the location meeting Objective Criteria #8 for storage of hydrocarbons or produced liquid in excess of 5,200 barrels.

This request for additional information stops the statutory 1041 60-day clock for the COGCC's review. The COGCC will resume review of this Form 2A upon receipt of all required information and the COGCC review will be conducted within 60 days. This Form 2A will remain ON HOLD, with all data and attachments intact, until Verdad Resources provides the COGCC with all necessary requested information. Verdad Resources may request the Form(s) be withdrawn if that is preferred. If you have any questions, please contact me.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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

303.894.2100 Ext. 5180

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

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

Wed, Jan 8, 2020 at 7:33 AM

Good Morning Doug,

Please see my responses below in red.

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Monday, January 06, 2020 3:12 PM
To: VR Regulatory <Regulatory@VerdadResources.com>
Subject: COGCC Form 2A review of Verdad Resources Timbro Fed 1931 location - Form 2A Doc #402254036)

[External Source]

Heather,

I have reviewed the referenced Form 2A and have the following comments.

1) Verdad has provided a Planning BMP indicating "*Verdad has submitted a WOGLA application with Weld county...*" Please provide me with the date the WOGLA was submitted to Weld County and I will add that to the Local Government section. **We have only submitted the notice of WOGLA. We should have the WOGLA application submitted in the next few weeks, but we have prepared it to comply with the new drainage report, so the disturbance is correct.**

2) A review of the Location Drawing indicates two VRTs and one Heater Treater. The Facilities section does not list any VRTs and two Heater Treaters. Please confirm the count of VRTs and Heater Treaters and, if necessary, revise the Location Drawing.

The location drawing is correct, both of those are my mistakes on the form. There are 2 VRTs and 1 heater treater.

3) The Location Drawing depicts 0.56 acres of topsoil immediately west of the pad. Is this topsoil pile currently present or is it where Verdad plans to stage the topsoil from this location? **It is where we plan to stage the topsoil.** Based on the Location Pictures it does not appear to be currently present. If it is where Verdad plans to stage the topsoil from this location, is this 0.56 acres included in the acreage size of the disturbed area/location indicated on the Form 2A? **it was not included, but it is now, disturbance area is 7.48**

If this topsoil pile is for this location, then please update the Location Drawing to indicate it is part of the disturbed area. **Revision attached**

4) In the Future Land Use Verdad has indicated both Improved Pasture and Rangeland. Given the general land use for this area, I suspect the Surface Owner is not going to plant and grow improved forage for their livestock where this locations is. I suspect Rangeland is the likely planned Future Land Use. Please confirm. **Yes rangeland.**

5) In the Water Resources section Verdad has indicated the estimated depth to groundwater is 156 feet based on water well Permit #98770. A review of this water well indicates 156 feet is the total depth and the reported static water level is 90 feet. Therefore, I would like to change the estimated depth to groundwater from 156 feet to 90 feet. **Confirmed.**

6) Verdad has indicated they will have upto 16 tanks on this location. Please tell me the size of these storage tanks as this may result in the location meeting Objective Criteria #8 for storage of hydrocarbons or produced liquid in excess of 5,200 barrels. **They are 400 bbl tanks**

This request for additional information stops the statutory 1041 60-day clock for the COGCC's review. The COGCC will resume review of this Form 2A upon receipt of all required information and the COGCC review will be conducted within 60 days. This Form 2A will remain ON HOLD, with all data and attachments intact, until Verdad Resources provides the COGCC with all necessary requested information. Verdad Resources may request the Form(s) be withdrawn if that is preferred. If you have any questions, please contact me.

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