

STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Doc# 1309425
Date: 01/02/2020**Re: Air Monitoring Plan - Folley, Damore, Prowant and Cummings**

1 message

Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Thu, Jan 2, 2020 at 4:20 PM

To: "Lytle, Andy" <Andy_Lytle@oxy.com>

Cc: Toni_Newville@oxy.com, Chad Schlichtemeier <Chad_Schlichtemeier@oxy.com>, Jeff Robbins - GOVOffice <jeff.robbsins@state.co.us>, John Noto - DNR <john.noto@state.co.us>, Doug Andrews <doug.andrews@state.co.us>

Andy, Toni, and Chad,

As discussed earlier, thank you for submitting this plan in response to the Condition of Approval on the Folley, Prowant, and Damore Form 2As. Conceptually, the COGCC approves this monitoring program. However, as discussed, the COGCC requests a final air monitoring plan be submitted which addresses a few shortcomings of the draft submitted here.

Specifically, the COGCC requests the following be updated in the final plan:

1. Include a provision to notify (verbally or by email) the COGCC immediately for any measured or assumed reading over the 9 ppb HGV. This notification would be to inform COGCC of proposed supplemental actions to be taken by Kerr-McGee (Oxy) and allow for coordination of duplicate sampling or site inspection by the COGCC.
2. Include GPS coordinates of the monitoring station locations in the reports or as requested by the COGCC.
3. Provide additional clarification on the establishment of the action level of 5 ppm vs. the trigger level of 1 ppm total hydrocarbons.
4. Include the Figures previously provided or as amended.
5. Clarify the protocol for collecting air samples whether automatically triggered or not.
6. Clarify the analyte list and confirm that all target analytes can be quantified with the specified method.
7. Ensure that Table 1 is attached.

The COGCC understands that the monitoring work will be performed by a third party consultant, hired by Kerr-McGee (Oxy).

The COGCC is aware that Kerr-McGee (Oxy) plans to mobilize the rig to begin drilling surface casings on the Folley pad during the week of January 6, 2020. According to the plan, Kerr-McGee (Oxy) will be conducting monitoring during that activity. The COGCC is therefore approving the air monitoring plan "as-is" for the drilling of surface casing on the Folley Pad, but expects that an approvable final plan will be submitted via Form 4 prior to beginning drilling the production portions of those same wells; additionally that final plan will need to be approved prior to spudding the wells at the Prowant and Damore Locations, as well as the Cummings Location following Form 2A approval.

Please contact me if you have any questions.

Thanks,
Greg

On Thu, Jan 2, 2020 at 9:16 AM <Andy_Lytle@oxy.com> wrote:

Greg,

Please find attached an updated version of our proposed Air Monitoring plan for the Folley, Damore, Prowant and Cummings locations. This version, compared to the one we shared with you earlier in December, includes some additional detail pertaining to reporting that we would like to discuss with you in our call later this morning. Looking forward to the call.

Regards,

Andy

Andy Lytle

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Greg Deranleau
Environmental Manager



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

The mission of the COGCC is to regulate the development and production of the natural resources of oil and gas in the state of Colorado in a manner that protects public health, safety, welfare, the environment and wildlife resources.

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Cc: Locations 470326, 470407, 470396 - "Correspondence re: Air Monitoring COA" 1/2/2020 (without attachments)