

FORM  
2A

Rev  
08/19

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:

401732132

Date Received:

12/05/2018

Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: \_\_\_\_\_

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**470899**

Expiration Date:

**01/16/2023**

This location assessment is included as part of a permit application.

CONSULTATION

- This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- This location is in a sensitive wildlife habitat area.
- This location is in a wildlife restricted surface occupancy area.
- This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10689  
Name: INCLINE OPERATING LLC  
Address: 5019 N CENTRAL EXPRESSWAY SUITE B  
City: DALLAS State: TX Zip: 80631

Contact Information

Name: Julie Friday  
Phone: (720) 534 0834  
Fax: ( )  
email: julie@inclineresources.com

FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): 20180028     Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- Waste Management Surety ID (Rule 704): \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Hungenberg Number: Pad  
County: WELD  
Quarter: SESE Section: 27 Township: 6N Range: 65W Meridian: 6 Ground Elevation: 4693  
Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.  
Footage at surface: 1030 feet FSL from North or South section line  
283 feet FEL from East or West section line  
Latitude: 40.452490 Longitude: -104.640825  
PDOP Reading: 1.4 Date of Measurement: 07/02/2018  
Instrument Operator's Name: Ryan Desmond

LOCAL GOVERNMENT INFORMATION

County: WELD Municipality: N/A



## CONSTRUCTION

Date planned to commence construction: 04/01/2020 Size of disturbed area during construction in acres: 5.00  
Estimated date that interim reclamation will begin: 10/01/2020 Size of location after interim reclamation in acres: 3.00  
Estimated post-construction ground elevation: 4693

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

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

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?           

Reuse Facility ID:                    or Document Number:                   

Centralized E&P Waste Management Facility ID, if applicable:                   

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Hungenberg UH Farms LLLP

Phone:                                   

Address: 976 N Balsam

Fax:                                   

Address:                                   

Email:                                   

City: Greeley State: CO Zip: 80631-9533

Surface Owner:  Fee  State  Federal  Indian

Check all that apply. The Surface Owner:  is the mineral owner  
 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 from or produced to this Oil and Gas Location: No

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

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

Date of Rule 306 surface owner consultation 06/22/2018

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s):                                   

## CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe):

Subdivided:  Industrial  Commercial  Residential

Future Land Use (Check all that apply):

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe): \_\_\_\_\_

Subdivided:  Industrial  Commercial  Residential

## CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	510 Feet	498 Feet
Building Unit:	540 Feet	582 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	271 Feet	92 Feet
Above Ground Utility:	243 Feet	64 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	271 Feet	104 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.  
 - 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.  
 -For measurement purposes only, Production Facilities should only include those items with an asterisk(\*) on the Facilities Tab.

## SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)?  Yes  No

## 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.  
 - Large UMA Facility – 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: 08/15/2018

## FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

Any move to the East and North would put the pad closer to the critical flight zone of the Greeley Weld Airport. Any move to the West would put the pad closer to the floodplain. Incline looked at the two tracts to the North (Platte River Midstream and NGL Terminals) but the only location a pad could be placed is on the southern portion and it is covered by right of ways that don't allow structures to be placed on top of the surface. Saddle Butte Rockies Storage Terminal is owned by Noble Energy who will not grant a surface location on their property to another operator. Operator feels this production facility location is the best option given the property boundaries, utility easements and current COGCC setbacks. See Operator Comments for additional siting rationale.

## SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 51 - Otero sandy loam, 1 to 3 percent slopes

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

**PLANT COMMUNITY:**

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes  No

Plant species from:  NRCS or,  field observation Date of observation: \_\_\_\_\_

List individual species:

Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- Alpine (above timberline)
- Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area:  No  Yes

Distance to nearest

downgradient surface water feature: 14 Feet

water well: 608 Feet

Estimated depth to ground water at Oil and Gas Location 15 Feet

Basis for depth to groundwater and sensitive area determination:

Location is sensitive due to proximity to ditch and shallow depth to groundwater.  
Depth to groundwater taken from water well permit #2378.

Is the location in a riparian area:  No  Yes

Was an Army Corps of Engineers Section 404 permit filed  No  Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

Is the Location within a Floodplain?  No  Yes Floodplain Data Sources Reviewed (check all that apply)

Federal (FEMA)

State

County

Local

Other \_\_\_\_\_

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

## WILDLIFE

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on \_\_\_\_\_

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area
- 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)

## RULE 502.b VARIANCE REQUEST

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

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

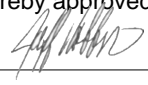
Additional Siting Rationale: Operator designed the Hungenberg Production Facility to be a safe distance from neighboring houses and buildings, clear of the 100 year flood plain and located efficiently for regular maintenance and access. Operator agreed upon an oil and gas operations area per the landowner/operator Surface Use Agreement pertaining to these horizontal wells. Where possible, consolidation of existing facilities has been attempted to keep the disturbed area to a minimum. Operator feels this production facility location is the best option given the property boundaries, utility easements and current COGCC setbacks.

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

Signed: \_\_\_\_\_ Date: 12/05/2018 Email: regulatory@ascentgeomatics.com

Print Name: Justin Garrett Title: Regulatory Analyst

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved:  Director of COGCC Date: 1/17/2020

**Conditions Of Approval**

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

**COA Type****Description**

Emissions mitigation	Operator shall not begin well drilling operations on the location until an Air Monitoring Plan has been submitted to the COGCC and approved by the Director.
Construction	Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect an irrigation ditch located 14 feet east of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.
Material Handling and Spill Prevention	The location is in a sensitive area due to shallow groundwater, therefore, the operator shall line the secondary containment areas for the tanks and separators with an impervious material.
Planning	Operator shall post a copy of the approved Form 2A on the location during all construction, drilling, and well completion activities.

**Best Management Practices****No BMP/COA Type****Description**

1	Planning	604.c.(2)J.ii Backup stabbing valves will be required on well servicing operations during reverse circulation. Valves shall be pressure tested before each well servicing operation using both low-pressure air and high-pressure fluid.
2	Planning	604.c.(2)N. Control of fire hazards: All material that is considered a fire hazard shall be a minimum of 25' from the wellhead tanks or separators. Electrical equipment shall comply with API IRP 500 and will comply with the current national electrical code.
3	Planning	Rule 604.c.(2).E. Multi-well Pads: Multi-well Pads are located in a manner which allows for resource extraction while maintaining the highest distances possible from the offsetting residential areas and complies with the wishes of the surface owner.
4	Planning	Rule 604.c.(2).L. Drill stem tests: Closed chamber drill stem tests shall be allowed. All other drill stem tests shall require approval by the Director. Drill stem tests will not be performed.

5	Planning	Rule 604.c.(2).V. Development from existing well pads: Where possible, operators shall provide for the development of multiple reservoirs by drilling on existing pads or by multiple completions or commingling in existing wellbores per Rule 322. If any operator asserts it is not possible to comply with, or requests relief from, this requirement, the matter shall be set for hearing by the Commission and relief granted as appropriate. Existing well pads were considered but not used. The ownership of the mostly single-well pad locations presented feasibility issues for expansion into a multi-well pad location.
6	Planning	Prior to the Hungenberg Pad going into production and in an effort to reduce air emissions and truck traffic, pipelines shall be in place to remove all oil and gas from the drilling site.
7	Pre-Construction	Rule 604.c.(2).U. Identification of plugged and abandoned wells: Plugged and abandoned wells will be identified pursuant to 319.a.(5). The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument.
8	Traffic control	Access Roads: The access road will be constructed to accommodate local emergency vehicles. This road will be maintained for access at all times. Weld County doesn't require a traffic control plan or a traffic study for drilling operations. An access permit will be obtained from Weld County prior to construction.
9	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pickup trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
10	General Housekeeping	Rule 604.c.(2).T. Well site cleared: The well site will be cleared of all non-essential equipment, trash and debris ninety (90) days after a well is plugged and abandoned.
11	Storm Water/Erosion Control	Storm Water Management Plan (SWMP) will be in place to address construction, drilling and operations associated with oil and gas development through the state of Colorado in accordance with CDPHE General Permit Rules. BMP's will vary according to location and will remain in place until the pad reaches final reclamation.
12	Material Handling and Spill Prevention	604.c.(2)R Tank Specifications: Tanks will be designed, constructed and maintained in accordance with NFPA Code 30 (2008 version). All tanks are visually inspected by the operator weekly at a minimum to a maximum of daily and annual SPCC inspections will be conducted and documented. Inspection and record retention of tank inspections will be in accordance per SPCC regulation. All records will be made available to the COGCC upon request. Operator shall comply with state and federal laws, rules and regulations governing the presence of any petroleum products, toxic or hazardous chemicals or wastes on the Subject lands.
13	Material Handling and Spill Prevention	Spill prevention control and countermeasure plan is in place to address construction, drilling and operations associated with oil and gas development throughout the state of Colorado in accordance with CFR 112.

14	Material Handling and Spill Prevention	Rule 604.c.(2).F. Leak Detection Plan: Operator will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks and fittings. Additionally annual SPCC inspections will be conducted and documented. Annual flowline testing will also occur according to COGCC rules 1101 and 1102. Tanks and all visible pipelines and valves etc. are inspected on a daily basis by company lease operators. Operator also conducts formal annual SPCC inspections, and formal site specific and random audits, by third-party consultants to inspect for general site conditions as well as condition of tanks, pipelines, and containment structures. Company lease operators and Production staff review production records, including volumes and pressures, looking for irregularities that may indicate a problem with a tank or pipeline. If an irregularity is detected that may indicate a potential release the suspect tank and/or pipeline(s) are removed from service, isolated, and either pressure tested or visibly inspected for indications of a potential leak. All malfunctions, improper operation of equipment, evidence of leakage, spills, stained or discolored soil, etc. are logged and communicated in a timely manner to the supervisor for proper response.
15	Dust control	805.c. Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers may be used.
16	Construction	803. Light sources during all phases of operations will be directed downwards and away from occupied structures where possible. Permanent lighting shall be mounted at compressor stations on a pole or building and directed downward to illuminate key areas within the facility, while minimizing the amount of light projected outside the facility.
17	Construction	Guy line anchors: All guy line anchors shall be brightly marked pursuant to Rule 604.c.(2)Q.
18	Construction	604.c.(2).K. Tank level Indicators will be used at this location.
19	Construction	604.c.(2)M. Fencing: A meeting with the surface owner will determine a fencing plan. The location will be adequately fenced to restrict access by unauthorized persons. The tanks will be shielded from view by a permanent fence.
20	Construction	604.c.(2).O. All oil and water loadouts that are commonly used have a load bucket and isolation valve. Since they are used often, there is not a bull plug installed. Any loadouts (water on back of tanks for example) that are rarely used, are bull plugged without a load bucket.
21	Construction	Rule 604.c.(2).G. Berm Construction: Tanks berms shall be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. All berms will be visually checked periodically to ensure proper working condition.
22	Noise mitigation	604.c.(2).A. Noise: This location is in an airport overlay. The FAA has completed their determination and issued a Determination of No Hazard. No height restriction was issued for sound walls or drilling rig, and operations were deemed to not have any nuisance impact requiring sound walls to mitigate sound coming towards the airport.  A noise study has been conducted and recommendations made. Incline will follow the recommendations by using a full-wrap 32-foot sound wall for mitigation, and additional mitigations around the pumps and generators.

23	Emissions mitigation	<p>Rule 604.c.(2).C. Green Completions - Emission Control Systems: Flow lines, separators, and sand traps capable of supporting green completions as described in Rule 805 shall be installed at any Oil and Gas Location at which commercial quantities of gas are reasonably expected to be produced based on existing adjacent wells within 1 mile. Operator will connect to a gas sales line prior to flowback and immediately direct salable quality gas down line.</p> <p>Uncontrolled venting shall be prohibited in an Urban Mitigation Area.</p> <p>Temporary flowback flaring and oxidizing equipment shall include the following:</p> <ul style="list-style-type: none"> <li>• Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius;</li> <li>• Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment;</li> <li>• Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases.</li> </ul>
24	Emissions mitigation	Operator shall perform air emissions monitoring during all phases of operations, including drilling and completions.
25	Emissions mitigation	Sealed tanks with pressure relief valves and emissions controls will be utilized for the production facilities.
26	Odor mitigation	805. Oil & gas facilities and equipment shall be operated in such a manner that odors do not constitute a nuisance or hazard to public welfare. Operator will not utilize oil based mud systems. Hydrocarbon odors from production facilities are minimized and eliminated by keeping produced fluid hydrocarbons and natural gas contained within pipes, separators, tanks, and combustors. All tanks will be sealed with thief hatches and gaskets. Tank vapors are captured with properly sized piping and combustors.
27	Drilling/Completion Operations	Rule 604.c.(2).B. Closed Loop Drilling System - Pit Restrictions: A closed –loop system will be used for drilling operations. Pits will not be utilized at this location.
28	Interim Reclamation	Operator shall be responsible for segregating the topsoil, backfilling, re-compacting, reseeded, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and shall reclaim such area to be returned to pre-existing conditions as best as possible with control of all noxious weeds.

Total: 28 comment(s)

### Attachment Check List

<b>Att Doc Num</b>	<b>Name</b>
2479004	RULE 306.E. CERTIFICATION
2479005	CORRESPONDENCE
2479342	OPERATOR RESPONSE TO PUBLIC COMMENTS
2479349	OBJECTIVE CRITERIA REVIEW MEMO
401732132	FORM 2A RESUBMITTED
401855581	FORM 2A REJECTED
401857308	ACCESS ROAD MAP
401857309	FACILITY LAYOUT DRAWING
401857310	HYDROLOGY MAP
401857312	LOCATION DRAWING
401857313	LOCATION PICTURES
401857314	MULTI-WELL PLAN
401857317	SURFACE AGRMT/SURETY
401857339	NRCS MAP UNIT DESC
401861862	WASTE MANAGEMENT PLAN
401862011	PRE-APPLICATION NOTIFICATION CERTIFICATION

Total Attach: 16 Files

### General Comments

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Final Review	Final Review Status: Task Passed.	01/16/2020
OGLA	COGCC staff reviewed and considered all public comments received for this Form 2A.	01/16/2020
OGLA	The operator indicated to OGLA staff during the technical review that 300 barrel tanks will be used and that the total volume of tank storage is not planned to exceed 5,200 barrels.	01/15/2020
Final Review	Final Review status Pending - referred to OGLA staff for additional review: - request confirmation from operator that total tank volume (10 oil tanks and 6 water tanks) is less than 5200 barrels and does not meet Objective Criteria #8.	01/15/2020
Final Review	Removed docket #181000716; Drilling and Spacing Unit (DSU) application was heard at COGCC's September 2019 hearing and approved as spacing order 407-2910. Associated APDs have been updated with this spacing order with operator concurrence.	01/15/2020
OGLA	The Objective Criteria Review Memo (Doc #2479349) is attached to this Form 2A. Following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.	01/06/2020
OGLA	Operator agreed to pipe away oil and gas from the location, conduct air emission monitoring during drilling and well completion activities, and provided an update to their response to the Public Comments.	01/06/2020
OGLA	Contacted operator and requested they provide an Alternate Location Assessment for the Director to review.	11/07/2019
OGLA	The operator provided a Response to Public Comment document, addressing the concerns of the nearby Building Unit owner. This document has been attached to the Form 2A.	09/19/2019
OGLA	COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria # 1, 3, & 5c.	09/10/2019
Permit	Permitting Review Complete.	08/13/2019
Permit	COGCC Staff has added the Local Government siting permit information and the School and Childcare Center distances provided by the operator.	08/12/2019
Permit	In Process: APDs back in process 6/22/19. Added docket #181000716.	07/16/2019
OGLA	Per the Rule 306.e. Certification letter, the operator has met with the BU owner to the south (the nearest BU) on two occasions to discuss their concerns. This is the same BU Owner that placed a Public Comment on this Form 2A.  This Oil & Gas Location is approximately 1,450 feet from the Greeley municipal boundary, specifically the Greeley-Weld County Airport.	05/29/2019
Permit	ON HOLD: APDs have been rejected.	04/18/2019
OGLA	IN PROCESS - Operator indicated the operator contact is registered with the COGCC, revised the pipeline description, revised the date of construction and interim reclamation, provided additional siting rationale, provided more specific information for several of the 604.c.(2) mitigation measure BMPs, requested the BMP about anchoring their equipment be removed as the location is not in a floodplain, & provided the required 306.e. Certification letter.	02/11/2019
OGLA	ON HOLD - Requested operator provide an operator contact that is registered with the COGCC, confirm if VRUs will be used and revise the pipeline description if necessary, revise the date of construction and interim reclamation, provide additional siting rationale, provide more specific information for several of the 604.c.(2) mitigation measure BMPs, confirm whether the operator intends to anchor their equipment, & provide the required 306.e. Certification letter. Due by 2/24/19.	01/24/2019
Permit	Passed completeness.	12/28/2018
OGLA	Passed Buffer Zone completeness review.	12/21/2018
OGLA (Rejected)	REJECTED - As part of the review of this Form 2A Oil & Gas Location Assessment, it was determined that four attachments need revising/correcting. They are as follows: * Pre-application Notification Certification - The letter references Rule 318A.a. - Exception Location Requests. It should reference Rule 305.a.(2)	11/29/2018

	<p>* Waste Management Plan - It indicates water based fluids and cuttings will be disposed of at COGCC approved land farms and land application sites. If this is the case, note which land farms/land application sites. However, the Form 2A indicates they will be disposed of at a Commercial Disposal facility. Also, the Form 2A indicates oil based muds will not be used, but the Odor mitigation BMP discusses controlling odors from oil based muds.</p> <p>* Facility Layout Drawing does not show all of the production facilities listed in the Facilities section of the Form 2A. Also, the drawing shows some boxes labelled as Misc Facility. These need to be better labelled as to what they area.</p> <p>* Location Drawing - We have received a Public Comment from Jessie and Jamie Silva (the nearest Building Unit owner) indicating that the upstairs portion of their detached garage is a mother-in-law suite. This would make it a Building Unit and the closest Building Unit. The Location Drawing and Cultural Setback Distance section should be revised to reflect this.</p> <p>Additionally, as this proposed location is in a Buffer Zone, the following 604.c.(2) mitigation measure BMPs need to be included on this Form 2A but were not.</p> <ul style="list-style-type: none"> <li>B. Closed Loop Drilling System - Pit Restrictions</li> <li>C. Green Completions - Emission Control Systems</li> <li>E. Multi-well Pads</li> <li>F. Leak Detection Plan</li> <li>G. Berm Construction</li> <li>L. Drill stem tests</li> <li>T. Well site cleared</li> <li>U. Identification of plugged and abandoned wells</li> <li>V. Development from existing well pads</li> </ul> <p>Please make these revisions/corrections and resubmit the Form 2A.</p>	
OGLA	<p>The following Public Comment was emailed to the COGCC on November 12, 2018.</p> <p>Dear COGCC,</p> <p>We are writing today to ask the COGCC to hold a new operator in the DJ basin (Incline Operating, LLC) to standards that have already been accepted by other operators in the basin for well located in a buffer zone. To date Incline only operates a single vertical well and has not drilled, completed, or produced a horizontal well in the DJ basin. We believe it is important to make sure that new operators to the basin live up to expectations already established.</p> <p>We live at 21873 WCR 64, Greeley CO, 80631. Our house is located ~540' from the proposed wells and we will be the most impacted by these proposed operations. The house across the street is a rental and we doubt they will comment. Growing up in Weld county we are familiar with oil and gas operations but not as familiar with the permitting process. Please accept these comments as we missed the opportunity during the pre-application process.</p> <p>Site selection is key to the future of oil and gas development, and from the notification zone drawing it appears as though the Hungenberg pad has been located as close to homes as possible without regard for the COGCC rule of 604.c.(2)E.i. where Multi-well production facilities SHALL be located as far as possible from Building Units. It is obvious that the farmland to the North was given higher value than the proximity to our home. Or perhaps the industrial land to the east would be much better suited from a land use perspective? The siting rational for this location seems weak, at the WOGLA consultation Incline committed to looking into alternative sites. Please have this additional work included in the siting rational.</p> <p>Additional Requests:  Our Mother-in-law suite on top of the garage is located 540' from the proposed wells. Currently this is identified as a building and not a building unit. Can the Notification Drawing be revised along with the cultural distances in the 2a to reflect this information? Please see attached notification zone drawing edits, it also appears there may be some mistakes in the measured distances.  An oil terminal is located in the adjacent property, and we ask the an Oil Pipeline be added as a COA for dust, traffic, and noise</p>	11/28/2018

~600' to the North East  
LACT is already noted on Site Layout for an oil pipeline connect  
Salt water disposal wells are located nearby and we ask that a water pipeline be added as a COA for dust, traffic, and noise  
NGL C4 and C4A SWD is located ~3700' East  
EWS 2~ SWD is located ~6300' South East  
Access for location will be from WCR 45, per SUA and Notification Zone drawing  
4 VOC combustors are identified on the 2a but only 2 are shown on the Site Layout Drawing?  
Assume this combustor will not be located in a manner that would be closer than the cultural distances identified?  
No maintenance tank is identified on the Site Layout drawing  
Assume this tank will not be located in a manner that would be closer than the cultural distances identified?

Standards to live up to:  
Please note a more complete list of BMP's. As a new operator to the basin, an never drilled or operated a horizontal well, we feel that it would be prudent to make sure shortcuts are not taken out of ignorance.

Facilities: to ensure longevity of flowlines we request fusion bonded steel pipe and have proper cathodic protection throughout the run. All welds on these are 100% x-ray and hydro tested to the API and Manufactures specs for a class 1500 series flange.

Note Oil Based Drilling muds will not be used under the drilling program on page 2, and then a BMP #16 states utilizing an advanced oil based mud? Seems confusing.

With all these changes/error in identification of building units, cultural distances, and the location appearing to be located as close as possible to homes, would it be beneficial to reject these permits so this new operator can get it right from the beginning?

Additional BMP Request: (typical buffer zone BMP/COA)

6 Traffic control 604.c.(2)S. Access Roads: The access road will be constructed to accommodate local emergency vehicles. This road will be maintained for access at all times. Traffic will be routed to minimize local interruption. During construction and through the life of this location, Operator will utilize recycled asphalt. Additionally, the access road will be constructed with aggregate road base material and vehicle speeds will be limited to ten miles per hour to reduce dust.

Low profile tanks for fluid storage

Light sources will be directed downwards

Sound Wall along Southern edge of property and ~20' from corner to mitigate sound  
604.c.(2).G. Berm construction. Tank berms shall be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. All berms will be visually checked weekly at a minimum to a maximum of daily to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel.

604.c.(3)B. Berm Construction. Tank berms shall be constructed of steel rings with a synthetic or engineered liner and designed to contain 150% of the capacity of the largest tank. Metal containment rings will be placed around the separators. All berms will be visually checked weekly at a minimum to a maximum of daily to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Tertiary containment, such as an earthen berm, will be installed around production facilities. All berms will be visually checked daily to ensure proper working condition. Inspection and record retention of berm inspections will be in accordance per SPCC regulation. All records will be made available to the COGCC upon request. Operator will bring a new or expand existing gas sales lines, in a timely manner, to send salable quality gas immediately down the sales line. Operator will ensure the connect is in place to take gas downline immediately.

604.c.(2)C.i. Green Completions - Emission Control System. Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completions techniques pursuant to COGCC Rules.

Tanks will be filled using a local water source through temporary waterlines. No water will

	be trucked to location.  Kindest Regards Jesse and Jamie Silva Jesse and Jamie Silva	
OGLA	Extended public comment period 10 days at the request of the Weld County LGD per Rule 305.d.(1)A. The new comment period end date is 11/28/2018.	11/05/2018
Permit	Passed Completeness	10/29/2018
OGLA	Passed Buffer Zone completeness review. Address leak detection plan, green completions BMP, noise mitigation BMP, and loadline bull plug BMP during technical review.	10/29/2018
Permit	Referred to OGLA supervisor for buffer zone review	10/15/2018

Total: 25 comment(s)