



STATE OF
COLORADO

Christopher - DNR, Brian <brian.christopher@state.co.us>

Fwd: Requesting Additional Information

12 messages

Trask - DNR, Sabrina <sabrina.trask@state.co.us>
To: Brian Christopher - DNR <brian.christopher@state.co.us>
Cc: John Noto - DNR <john.noto@state.co.us>

Tue, Jan 28, 2020 at 3:00 PM

Brian,

Here is the correspondence with Verdad on the KBL location, including an attached Hydrology Map. I have cc'd you on another email to Heather (a few minutes ago) so you have her contact info if you don't already have it.

Thanks!
Sabrina

Sabrina Trask
Senior Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5125 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
sabrina.trask@state.co.us | www.colorado.gov/cogcc

----- Forwarded message -----

From: **VR Regulatory** <Regulatory@verdadresources.com>
Date: Wed, Jan 8, 2020 at 7:26 AM
Subject: RE: Requesting Additional Information
To: Trask - DNR, Sabrina <sabrina.trask@state.co.us>
Cc: VR Regulatory <Regulatory@verdadresources.com>, Housey - DNR, Melissa <melissa.housey@state.co.us>, John Noto - DNR <john.noto@state.co.us>

Good Morning- Please find the attached revised hydrology map pursuant to your request. I believe that answers all the questions from the review.

In addition, we did send a notice to the BUO west of the pad on December 17th with no response.

This location is our top priority and we would like to get it through as soon as practical. Please let me know if you have any questions or concerns and I will get you a response as soon as possible.

Thanks so much,

Heather Mitchell
Regulatory Manager
Verdad Resources

HMitchell@verdadoil.com

720-845-6917

From: Trask - DNR, Sabrina <sabrina.trask@state.co.us>
Sent: Monday, January 06, 2020 11:07 AM
To: Heather Mitchell <HMitchell@VerdadResources.com>
Cc: VR Regulatory <Regulatory@VerdadResources.com>; Housey - DNR, Melissa <melissa.housey@state.co.us>; John Noto - DNR <john.noto@state.co.us>
Subject: Re: Requesting Additional Information

Hi, Heather,

Yes, please include the stock pond (~600' east-southeast) and the intermittent ponds (~200' north) on the Hydrology Map. (I don't think they need to be included on the Location Drawing.) If the stock pond no longer exists please note that on the map, as it is still visible as a potential surface water receptor on our 2017 aerial image layer.

Thanks,

Sabrina

image.png

Sabrina Trask

Senior Oil & Gas Location Assessment Specialist



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sabrina.trask@state.co.us | www.colorado.gov/cogcc

On Mon, Jan 6, 2020 at 10:51 AM Heather Mitchell <HMitchell@verdadresources.com> wrote:

Hi Melissa- our wells are drilling pretty fast and this location is coming up a bit quicker than expected. Can you clarify that the water feature to the east is a what my surveyor believes to be a stock pond from imagery from 2016 – that does not show up in 2017 aerials? Also do you want the intermittent ponds near the railroad also identified on the location drawing and hydrology map? I would like to get this information clarified so I can have our surveyor can get the documents updated correctly to you.

Thanks,

Heather Mitchell

Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

From: VR Regulatory

Sent: Thursday, January 02, 2020 10:22 AM

To: VR Regulatory <Regulatory@VerdadResources.com>; Housey - DNR, Melissa <melissa.housey@state.co.us>

Cc: John Noto - DNR <john.noto@state.co.us>; Trask - DNR, Sabrina <sabrina.trask@state.co.us>

Subject: RE: Requesting Additional Information

I was able to find the document that was received by COGCC in our folders and it definitely matches a little more clearly to what you are reviewing, my answers are revised in purple.

From: VR Regulatory <Regulatory@VerdadResources.com>

Sent: Thursday, January 02, 2020 9:17 AM

To: Housey - DNR, Melissa <melissa.housey@state.co.us>; VR Regulatory <Regulatory@VerdadResources.com>

Cc: John Noto - DNR <john.noto@state.co.us>; Trask - DNR, Sabrina <sabrina.trask@state.co.us>

Subject: RE: Requesting Additional Information

Hi Melissa- Please see my responses below in red. I am also attaching what I show I re-submitted on 10.16.2019. There seems to be some differences in what you are reviewing, however, when I go to eforms to view the 2A in your system, I am getting an error that won't pull it up. The form I am looking at, that I saved in our files, is the same document number referenced, but all the BMPs you are referencing are different and the information related to sensitive area is not the same either. I am getting the information updated as it relates to the intermittent ponds to the north. In the meantime, I want to clarify we are looking at the same thing. I am attaching what I have saved for your reference. If it is different than what you are reviewing, please forward that along to me.

Thanks and hopefully we can clear up the confusion at least on my end.

Heather Mitchell

Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

From: Housey - DNR, Melissa <melissa.housey@state.co.us>
Sent: Monday, December 23, 2019 4:42 PM
To: Heather Mitchell <HMitchell@VerdadResources.com>; VR Regulatory <Regulatory@VerdadResources.com>
Cc: John Noto - DNR <john.noto@state.co.us>; Trask - DNR, Sabrina <sabrina.trask@state.co.us>
Subject: Requesting Additional Information

[External Source]

Hi Heather

Please find the COGCC's 1041 Response to the following Form 2A, Oil and Gas Location Assessment:

402098683 - KBL 02N-63-19 Pad

This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form on HOLD until additional information is received from the applicant.

In compliance with § 24-65.1-108(1), C.R.S., the COGCC is providing a written request for all additional information necessary for a final determination to be made on this application. The applicant may provide all requested additional information to COGCC via email. Upon receipt of all requested information, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application. In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for the Director to make a final determination:

1. Provide the reason for the Sensitive Area. [this location is within the Lost Creek Designated Groundwater Management Area.](#)
2. Verify the acreage on the Location Drawing as drawn, as it [appears to differ from the 13.35 acres reported on the Location Drawing and Form 2A.](#)

The location drawing in the attachments also references 13.35 acres for construction disturbance.

3. Remove the reference to SPCC regulations in BMPs #6 and #8.

[BMP # 6 Containment will be used during fueling of equipment to contain spills and leaks all phases of operations.](#)

[Tank secondary containment will be impervious lined\(either poly or spray in liner\) steel berms with capacity > 150% volume of the largest tank. Pad will also have tertiary containment of ditch and berm to prevent any spills from leaving site. All spills will be immediately cleaned up and will be reported if volume meets reporting limit.](#)

[BMP# 8 Separators are encompassed by steel berms and surrounded by 1-2 feet of road base that is](#)

[That is sufficiently impervious to greatly minimize impact to the soil from any potential leak or drip from the separators. Sites](#)

[are visited daily so a spill would be detected and cleaned up before any significant](#)

[infiltration could occur. The berms would contain a spill from leaving the area around](#)

[the separators.](#)

4. Remove the language regarding the CDPHE Stormwater Management Plan from the following BMP and revise the "frequencies/2- to 4-inch stone" language in BMP #4.

The location will have stormwater control measures consisting of a berm around the perimeter of the location to divert clean water away from disturbed areas and to divert onsite runoff into a sediment trap, a ditch around the location to collect and divert runoff to a sediment trap, and two to four sediment traps to allow sediment to settle out of diverted stormwater runoff. Sediment trap spill way will use rip-rap, aggregate and/or wattles to further filter runoff.

These control measures will be inspected at the following frequencies:

Storm water controls are inspected every 14 days during construction, drilling and completions.

Once per month after that, until interim reclamation is completely established (approximately 2 years).

Once per year after that until facility abandoned

5. Separate the noise, light and odor BMPs written within the text of BMP #13.

My BMP # 13 is only related to odor

13 a The direction of prevailing winds is considered when planning the location in order to mitigate odor and noise from being a nuisance to the surrounding residents and occupied structures. In order to minimize sound levels during drilling operations at nearby residences, rig generators will be located as far as possible from the residence by rig orientation.

13 b Rig lighting will also be directed away from residential units.

6. Identify if Verdad will be using sound walls or straw bales in BMP #14.

Temporary straw bale walls or sound walls will be constructed on the west side of the pad and the utilization of "quiet" frac/axillary equipment will be constructed and utilized to dampen noise in the direction of residential units

7. Revise the wording in BMP #8 "which should help to reduce odors" to strengthen the BMP and clarify what is "1-2 feet," the thickness of the road base or the width of the berm.

BMP# 8 Separators are encompassed by steel berms and surrounded by 1-2 feet of road base that is

That is sufficiently impervious to greatly minimize impact to the soil from any potential leak or drip from the separators. Sites

are visited daily so a spill would be detected and cleaned up before any significant infiltration could occur. The berms would contain a spill from leaving the area around the separators.

8. Identify the surface water feature located approximately 600 feet to the east of the proposed Location on the Hydrology Map and Location Drawing as appropriate.

I am not seeing this water feature on the map? I am confirming with our surveyor as well.

9. Identify the intermittent ponds near the railroad tracks and highway approximately 200 feet to the north of the proposed Location.

I see these ponds, not sure exactly what they are, but I will get they have been identified on the maps.

This request for additional information stops the Weld County 1041 60-day clock. COGCC will resume review of the Form 2A upon receipt of the requested information: review shall be conducted within 60 days. Verdad Resources, LLC is under no obligation to respond to this email; the Form 2A will remain ON HOLD indefinitely, with all data and attachments in tact, until Verdad Resources, LLC provides COGCC with all of the requested information. Verdad Resources, LLC may request the permit is withdrawn, if preferred.

Thanks

Melissa

Melissa M. Housey, P.G.
Oil and Gas Location Assessment Specialist
Southeast



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KBL 02N-63W-19_HYDROLOGY_MAP_REV_20200107.pdf
625K

Heather Mitchell <HMitchell@verdadresources.com>

Wed, Jan 29, 2020 at 11:22 AM

To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>, "Trask - DNR, Sabrina" <sabrina.trask@state.co.us>

Hi Brian,

Please find the changes we discussed on the phone a few minutes ago. Let me know if I missed anything. I appreciate your help on this.

Revise the Distance to the nearest surface feature to be 190'N Per the revised hydrology map

Update the ground water depth to be 23' (the average of the water well to the north ~3560' of the reference well, Permit # 36519, Receipt 9063847 with a depth of 12' and the water well to ~6400 SE of the reference well, 65185-FP Receipt 0441141 with a depth of 35')

Distance to the BUO to the west is ~1020 from the boundary of the location.

Correction of BMP #4 (remove 2-inch to 4- inch stone) The location will have stormwater control measures consisting of a berm around the perimeter of the location to divert clean water away from disturbed areas and to divert onsite runoff into a sediment trap, a ditch around the location to collect and divert runoff to a sediment trap, and two to four sediment traps to allow sediment to settle out of diverted stormwater runoff. Sediment trap spill way will use rip-rap, aggregate and/or wattles to further filter runoff. These control measures will be inspected at the following frequencies:

Storm water controls are inspected every 14 days during construction, drilling and completions.

Once per month after that, until interim reclamation is completely established (approximately 2 years).

Once per year after that until facility abandoned

Combine BMP #6 and #9

To minimize potential impacts to soil, containment will be used during fueling of equipment to contain spills and leaks during all

phases of operations. Tank secondary containment will be lined with an impervious poly or spray in liner. Steel berms with capacity > 150% volume of the largest tank.

Pad will also have tertiary containment of ditch and berm to prevent any spills from leaving site.

Any spills will be immediately cleaned up and reported if volume exceeds reporting

limit.

Revise BMP #8 to remove the word surrounded

Separators are encompassed by steel berms with road base that is approximately 1-2 feet and it is sufficiently impervious per SPCC regulation to greatly minimize impact to the soil from any potential leak or drip from the separators. Sites are visited daily so a spill would be detected and cleaned up before any significant infiltration could occur. The berms would contain a spill from leaving the area around the separators.

BMP #14 Confirmation of sound wall to the west:

Temporary straw bale walls or sound walls will be constructed on the west side of the pad and the utilization of "quiet" frac/axillary equipment will be constructed and utilized to dampen noise in the direction of residential units

Please let me know if you need anything else!

[Quoted text hidden]

 **KBL 02N-63W-19_HYDROLOGY_MAP_REV_20200107.pdf**
625K

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Heather Mitchell <HMitchell@verdadresources.com>

Wed, Jan 29, 2020 at 12:31 PM

Heather,

Since the water resources sensitive area determination comment has been scattered in a few spots, I wanted you to confirm what I view as the assembled comment for accuracy.

This location is within the Lost Creek Designated Groundwater Management Area. The closest well shown on the COGCC and Hydrology Map is owned by Linda Schneider (Permit #269226, Receipt# 3604289) at a distance of 949 feet from the proposed location. The depth to ground water is 23 feet (the average of the water well to the north ~3560' of the reference well, Permit # 36519, Receipt 9063847 with a depth of 12' and the water well to ~6400 SE of the reference well, 65185-FP Receipt 0441141 with a depth of 35').

I think there was a mis-interpretation on the changes to BMP #8. What you sent over still read more that the metal berm is surrounded by compacted roadbase, rather than the separators and berms are sitting on top of the compacted roadbase layer. My interpretation is below. Are my assumptions accurate?

BMP #8

Separators are surrounded by steel berms and on top of....

While starting the memo I came up with three additional questions:

- A. Are the tanks on location going to be Verdad's standard 400 bbl tanks?
- B. Has there been any contact with Keensburg? My map has them owning the I-76 Frontage Road, within 1,500 feet of your location (Criteria 3).
- C. Can you let me know about sales lines for this location?

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist



P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Wed, Jan 29, 2020 at 12:54 PM

Hi Brian

See my response in red below.

Heather Mitchell
Regulatory Manager
Verdad Resources
HMitchell@verdadoil.com
720-845-6917

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Wednesday, January 29, 2020 12:31 PM
To: Heather Mitchell <HMitchell@VerdadResources.com>
Subject: Re: FW: Requesting Additional Information

Heather,

Since the water resources sensitive area determination comment has been scattered in a few spots, I wanted you to confirm what I view as the assembled comment for accuracy.

This location is within the Lost Creek Designated Groundwater Management Area. The closest well shown on the COGCC and Hydrology Map is owned by Linda Schneider (Permit #269226, Receipt# 3604289) at a distance of 949 feet from the proposed location. The depth to ground water is 23 feet (the average of the water well to the north ~3560' of the reference well, Permit # 36519, Receipt 9063847 with a depth of 12' and the water well to ~6400 SE of the reference well, 65185-FP Receipt 0441141 with a depth of 35').

Perfect- thank you

I think there was a mis-interpretation on the changes to BMP #8. What you sent over still read more that the metal berm is surrounded by compacted roadbase, rather than the separators and berms are sitting on top of the compacted roadbase layer. My interpretation is below. Are my assumptions accurate?

BMP #8

Separators are surrounded by steel berms and on top of...

Yes correct- I will update the language on my template.

While starting the memo I came up with three additional questions:

- A. Are the tanks on location going to be Verdad's standard 400 bbl tanks? **Yes**
- B. Has there been any contact with Keensburg? My map has them owning the I-76 Frontage Road, within 1,500 feet of your location (Criteria 3). **Yes we notified them for the WOGLA application and Mark Gray responded with no concerns or comments**
- C. Can you let me know about sales lines for this location? **We will have a gas line, but we are not guaranteed a oil line at this point.**

[Quoted text hidden]

[Quoted text hidden]

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Heather Mitchell <HMitchell@verdadresources.com>

Wed, Jan 29, 2020 at 3:44 PM

- Found two more things needing updates:
- A. WOGLA and local government information.
 - B. Updated construction start and interim start dates.

Brian Christopher
Oil & Gas Location Assessment Specialist



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[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Wed, Jan 29, 2020 at 3:52 PM

- A. The 1041WOGLA19-0009 was approved 11.14.2019.
- B. Construction 2.8.2020, interim starts 8.8.2020

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]
[Quoted text hidden]

Thanks,

[Quoted text hidden]



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Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Heather Mitchell <HMitchell@verdadresources.com>

Wed, Jan 29, 2020 at 4:08 PM

A. The 1041WOGLA19-0009 was approved 11.14.2019. I will replace the existing comment with this. Do I have your concurrence to change the local government having jurisdiction to **yes, checking the box** for certifying an application has been filed, and changing the disposition to **approved**?

Brian Christopher
Oil & Gas Location Assessment Specialist



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Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Wed, Jan 29, 2020 at 6:28 PM

Yes!

Sent from my iPhone

On Jan 29, 2020, at 4:07 PM, Christopher - DNR, Brian <brian.christopher@state.co.us> wrote:

[Quoted text hidden]
<image001.png>
[Quoted text hidden]
[Quoted text hidden]

image001.png
452K



Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Heather Mitchell <HMitchell@verdadresources.com>

Thu, Feb 6, 2020 at 12:07 PM

Heather,

The KBL had three things come up in Final Review for correction:

1. Updated construction start and interim reclamation dates.
2. The first BMP should be updated to indicate Verdad has an approved WOGLA application with Weld County, and the other updates to this BMP related to the WOGLA. Please update the BMP and send me the new text.
3. The second Noise mitigation BMP has a spelling error. *Temporary straw bale walls or sound walls will be constructed on the west side of the pad and the utilization of "quiet" frac/axillary equipment will be constructed and utilized to dampen noise in the direction of residential units.*

Please let me know the answers to these and concurrences to change them and I will move this location along.

Brian Christopher
Oil & Gas Location Assessment Specialist



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1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Thu, Feb 6, 2020 at 12:14 PM

See answers below in red. Let me know if you need anything else.

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Thursday, February 06, 2020 12:07 PM
To: Heather Mitchell <HMitchell@VerdadResources.com>
Subject: Re: Requesting Additional Information

Heather,

The KBL had three things come up in Final Review for correction:

1. Updated construction start and interim reclamation dates. **2/10/2020 and 8/10/2020**
2. The first BMP should be updated to indicate Verdad has an approved WOGLA application with Weld County, and the other updates to this BMP related to the WOGLA. Please update the BMP and send me the new text.

Verdad has an approved WOGLA application with Weld county that addresses site safety and contains an emergency action and tactical response plan. Each location is assigned a physical address for emergency responders to locate the site in the event of an emergency. 1041WOGLA19-0009 was approved 11/14/2019

3. The second Noise mitigation BMP has a spelling error. *Temporary straw bale walls or sound walls will be constructed on the west side of the pad and the utilization of "quiet" frac equipment will be constructed and utilized to dampen noise in the direction of residential units.*

I removed the word because I did not feel like it was relevant.

[Quoted text hidden]

[Quoted text hidden]

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Heather Mitchell <HMitchell@verdadresources.com>

Thu, Feb 6, 2020 at 1:04 PM

Heather,

On the first BMP, can I drop the WOGLA number and date? It is already on the Form elsewhere.

Brian Christopher
Oil & Gas Location Assessment Specialist



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[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Thu, Feb 6, 2020 at 1:29 PM

Yes!

Sent from my iPhone

On Feb 6, 2020, at 1:04 PM, Christopher - DNR, Brian <brian.christopher@state.co.us> wrote:

[Quoted text hidden]