



STATE OF
COLORADO

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

FW: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

8 messages

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

Wed, Feb 12, 2020 at 7:17 AM

Here you go!

From: Heather Mitchell
Sent: Tuesday, February 11, 2020 8:37 AM
To: Christopher - DNR, Brian <brian.christopher@state.co.us>
Subject: RE: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

Hi Brian – see my answers below in Red. There are responses in the two below emails. Let me know if you have questions.

Thanks,

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

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Monday, February 10, 2020 10:55 AM
To: Heather Mitchell <HMitchell@VerdadResources.com>
Subject: Re: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

An additional question. Have any Health Study notices gone out to the residents within 2,000 ft of this location? **Yes – we sent notice on 1/24/2020**

Brian Christopher
Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5271

1120 Lincoln Street, Suite 801, Denver, CO 80203

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

On Mon, Feb 10, 2020 at 10:28 AM Christopher - DNR, Brian <brian.christopher@state.co.us> wrote:

Heather,

I have a handful of adjustments I would like to see for this location.

A. Please provide concurrence to remove the Landowner's name from the water well, leaving the permit number and receipt. **I concur**

B. Please provide a comment about the oil pipeline on your previous email for me to include on the Form (expanding your previous email). **Cureton will have a gas line to the location and black diamond will have an oil line to the location.**

C. I am looking at sound controls for the west side of the location. Please let me know how large (tall) the topsoil pile at the SW corner of the location is expected to be. If this pile is significant enough to reduce sound impacts to the west where the closest houses are, I would like to add language stating that to the sound mitigation BMP. **Topsoil pile will be approximately 6' tall per COGCC reclamation requirements and it may provide some sound mitigation.**

D. BMP 9 discusses remote-shut in capabilities. Does your system allow for remote monitoring as well? **We do monitor wellbore and line pressures.** If so, please expand this BMP to include that language. The existing language is: **I added below. Let me know if you need more.**

Verdad wells have remote monitoring and shut-in capabilities to mitigate spills and safety issues. Remote shut-in will allow Verdad to immediately shut a well in the event of a reported problem on location or in the event of a potential threat such as a grass fire or flood.

Thanks,

Brian Christopher

Oil & Gas Location Assessment Specialist



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On Mon, Jan 27, 2020 at 3:22 PM Heather Mitchell <HMitchell@verdadresources.com> wrote:

Hi Brian – I confirmed and we will have an oil line to this location. Black Diamond.

Thanks,

Heather

From: VR Regulatory

Sent: Friday, January 24, 2020 9:57 AM

To: Christopher - DNR, Brian <brian.christopher@state.co.us>; VR Regulatory <Regulatory@VerdadResources.com>

Cc: Penny Garrison - DNR <penny.garrison@state.co.us>; John Noto - DNR <john.noto@state.co.us>; Laurel Faber - DNR <laurel.faber@state.co.us>

Subject: RE: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

Hi Brian – please see my comments in red below.

Thanks,

Heather Mitchell

Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

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

Sent: Thursday, January 23, 2020 4:05 PM

To: VR Regulatory <Regulatory@VerdadResources.com>

Cc: Penny Garrison - DNR <penny.garrison@state.co.us>; John Noto - DNR <john.noto@state.co.us>; Laurel Faber - DNR <laurel.faber@state.co.us>

Subject: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

[External Source]

Hi, Heather,

Please find COGCC's 1041 Response for the following APD/2A: Georgene 2828-2833 & Form 2A Doc# 402216196

ON HOLD: 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 this written request for all additional information necessary for the COGCC to respond to 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 review:

1. Local Government Information. An approved WOGLA is listed in the comments, but the other sections indicate otherwise. Please provide clarification and concurrence to change. **Only the notice has been submitted. 1041WOGLA19-0025 will be submitted in the next few weeks.**
2. Please add the WOGLA permit number to the Form 2s. **1041WOGLA19-0025**
3. Operator Comments and Submittal. Submittal comment states WOGLA has not been submitted. Approved WOGLA number is in Local Government information. Please provide clarification and concurrence to change. **They assign the WOGLA number with notice- this one is not approved.**
4. The wells in related forms are missing. Please provide. **Do you want the draft #s? These have not been submitted yet, because they cannot be processed until later. However, these are the draft #s. 402146027 402146127 402146173 402146192 402146208 402146237 402146265 401246311**
5. Pertaining to Objective Criteria #1: Provide a description of any outreach and communication with all resident within 2,000 feet of the Location, and any response received. **There is only 1 residence within 2000'. The Defee parcel ~1900' west of the location. I sent a notice today.**
6. BMPs.
 - a. BMP #4, stormwater. Request concurrence to remove first sentence of BMP. Request concurrence to add "Inspections will occur" at the beginning of the inspections portion of the BMP. **I concur**
 - b. BMP #7, separator secondary containment. Clarify and concurrence to change that the separators are on roadbase that is approximately 1-2 feet thick, not surrounded by it. **I concur the separators are in a berm with 1-2 feet thick roadbase.**
 - c. BMP #8, tank secondary containment. Please provide an expanded BMP, including information such as berm material/construction and amount of containment.

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.

This request for additional information stops the statutory 1041 60-day clock for the COGCC's review. The COGCC will resume review of the Form(s) upon receipt of all required information and the COGCC review will be conducted within 60 days. Verdad is under no obligation to respond to this email; the Form(s) will remain ON HOLD, with all data and attachments intact, until Verdad provides COGCC with all necessary requested information. Verdad may request the Form(s) be withdrawn if that is preferred.

Please direct all questions or responses to brian.christopher@state.co.us.

Thank you.

Brian Christopher
Oil & Gas Location Assessment Specialist



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

Wed, Feb 12, 2020 at 10:33 AM

Heather,

We still have some concerns about sound mitigation off the west side of the location. Can this be strengthened?

Brian Christopher
Oil & Gas Location Assessment Specialist



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

Wed, Feb 12, 2020 at 10:34 AM

Also, has Verdad received any responses to the Health Study notices?

Brian Christopher
Oil & Gas Location Assessment Specialist



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

Wed, Feb 12, 2020 at 2:19 PM

No responses from the Health Study notification and we will add a sound wall to the west of this location

[Quoted text hidden]

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

Wed, Feb 12, 2020 at 3:23 PM

Can you re-work the noise mitigation BMP to include that sound wall and send it over to me?

Brian Christopher
Oil & Gas Location Assessment Specialist



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

Wed, Feb 12, 2020 at 4:10 PM

Hi Brian-

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

Let me know if this covers it for you!

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

Wed, Feb 12, 2020 at 4:21 PM

Just to build this BMP out and for your concurrence for the change:

Operator will consult with owners of residents and occupied structures and other stakeholders to reduce the impact of noise and light during drilling and completion operations. 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. Rig lighting will also be directed away from residential units. Temporary straw bale walls or sound walls will be constructed on the west side of the location and the utilization of quiet frac/auxiliary equipment will be constructed and utilized to dampen noise in the direction of residential units.

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2/12/2020

State.co.us Executive Branch Mail - FW: Requesting Additional Information: Verdad, Georgene 2828-2833 (Form 2A Doc# 402216196)

Heather Mitchell <HMitchell@verdadresources.com>

Wed, Feb 12, 2020 at 4:27 PM

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

That works for me.

FYI I just submitted a 2A and I know I forgot the multi-well plan. Anyway you could send that back to draft for me to add it? It is document 402298234

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