

STATE OF
COLORADO

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

Requesting Additional Information: Verdad, Georgene 2828-2833, Form 2A# 402216196

4 messages

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

Mon, Mar 2, 2020 at 4:00 PM

To: Heather Mitchell <HMitchell@verdadresources.com>

Cc: John Noto - DNR <john.noto@state.co.us>

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) Verify that the distance to the nearest Property Line from the well is 226 feet and not 217 feet as reported to the nearest Public Road.
- 2) Verify that the distance to the nearest Property Line from the production facility is 54 feet and not 43 feet as reported to the nearest Public Road.
 - In the event the Public Road is the Property Line, the Location Drawing needs to be updated and replaced.
- 3) Verify that the Land Use is, in fact, Irrigated Crop Land as there are no indications of irrigation within proximity to the proposed Location.
- 4) Total depth of the water well is reported as the Estimated Depth to Groundwater and is technically incorrect. Revisit the Estimated Depth to Groundwater. While it is old and contains weak location data, the permit 22672- water well does contain depth to water. It is one of the painfully few water wells in this area that contain information that are not completed in the Laramie-Foxhills Aquifer.
- 5) Provide a statement for the Basis of why the proposed Location lies within a Sensitive Area for water resources, to be included in the water resources tab. This statement should discuss depth to groundwater and proximity to surface water.
- 6) BMP #1 states that a WOGLA will be submitted. Please change the BMP language to reflect the submittal.
- 7) BMP #3 states that "Appropriate vehicle tracking control, such as a properly sized cattle guard or 2-inch to 4-inch stone, will still be required during production operations." This does not clearly dictate whether the Operator will install the structural BMP. The BMP also seems to indicate that the vehicle tracking might be temporary or permanent, this needs to be clarified.
- 8) BMP #4 – Please separate this sentence into shorter, more concise statements:

"The control measures will include: a diversion ditch and berm around the perimeter of the pad disturbance, to keep stormwater from flowing off the pad, with a culvert at the access road to allow stormwater to flow freely around the pad to sediment removal control measures; two sediment traps with armored inlets and outlets at the northwest and southwest corners of the pad to detain stormwater runoff from the pad and allow sediment to settle from the stormwater; and wattles at the sediment trap outlets to slow the departure of the water from the sediment trap and further remove any remaining sediment from the stormwater as well as a crop vegetative buffer over 200 feet to the North and over 1000 feet to the Northwest, the most likely directions of flow from the sediment trap outlets."

9) BMP #12 – Verify what type of noise mitigation will be used, sound walls or hay bales.

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.

Thank you.

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

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

Tue, Mar 3, 2020 at 3:42 PM

Good Afternoon Brian,

Please see my responses in red below. I did leave you a message as it related to sensitive area and what I have been told related to this determination. I know things change (every once in a while) at the COGCC, so let me know if I am incorrect.

Please let me know if you have questions or concerns.

Thanks,

Heather Mitchell
Regulatory Manager

Verdad Resources

HMitchell@verdadoil.com

720-845-6917

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

Sent: Monday, March 02, 2020 4:00 PM

To: Heather Mitchell <HMitchell@VerdadResources.com>

Cc: John Noto - DNR <john.noto@state.co.us>

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

[External Source]

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In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:

1. Verify that the distance to the nearest Property Line from the well is 226 feet and not 217 feet as reported to the nearest Public Road.

Our surveyors are using the edge of the road, which accounts for the difference. The distances are correct.

- 2) Verify that the distance to the nearest Property Line from the production facility is 54 feet and not 43 feet as reported to the nearest Public Road.

- In the event the Public Road is the Property Line, the Location Drawing needs to be updated and replaced.

Our surveyors are using the edge of the road, which accounts for the difference. The distances are correct.

2. Verify that the Land Use is, in fact, Irrigated Crop Land as there are no indications of irrigation within proximity to the proposed Location.

Please change to dry land

4) Total depth of the water well is reported as the Estimated Depth to Groundwater and is technically incorrect. Revisit the Estimated Depth to Groundwater. While it is old and contains weak location data, the permit 22672- water well does contain depth to water. It is one of the painfully few water wells in this area that contain information that are not completed in the Laramie-Foxhills Aquifer.

Depth to water on permit 22672 is 9' depth of the well is 32'. This well is approximately 3145' NW of the proposed location.

5) Provide a statement for the Basis of why the proposed Location lies within a Sensitive Area for water resources, to be included in the water resources tab. This statement should discuss depth to groundwater and proximity to surface water.

This location is a sensitive area due to the distance to surface water (intermittent pond) being less than 500' from the location and the depth to ground is shallow.

6) BMP #1 states that a WOGLA will be submitted. Please change the BMP language to reflect the submittal.

1041WOGLA19-0025 was submitted 2/3/2020.

7) BMP #3 states that "Appropriate vehicle tracking control, such as a properly sized cattle guard or 2-inch to 4-inch stone, will still be required during production operations." This does not clearly dictate whether the Operator will install the structural BMP. The BMP also seems to indicate that the vehicle tracking might be temporary or permanent, this needs to be clarified.

Mud control: Operator will implement effective vehicle tracking control, such as a properly sized cattle guard or 2-inch to

4-inch stone at the location egress to prevent transport of sediment offsite and onto the public road during all phases of operations.

8) BMP #4 – Please separate this sentence into shorter, more concise statements:

"The control measures will include: a diversion ditch and berm around the perimeter of the pad disturbance, to keep stormwater from flowing off the pad, with a culvert at the access road to allow stormwater to flow freely around the pad to sediment removal control measures; two sediment traps with armored inlets and outlets at the northwest and southwest corners of the pad to detain stormwater runoff from the pad and allow sediment to settle from the stormwater; and wattles at the sediment trap outlets to slow the departure of the water from the sediment trap and further remove any remaining sediment from the stormwater as well as a crop vegetative buffer over 200 feet to the North and over 1000 feet to the Northwest, the most likely directions of flow from the sediment trap outlets."

How is this?

The storm water and erosion control measures will include: a diversion ditch and berm around the perimeter of the pad disturbance, with a culvert at the access road, two sediment traps with armored inlets and outlets at the northwest and southwest corners of the pad, wattles at the sediment trap outlets to slow the departure of the water, as well as a crop vegetative buffer over 200 feet to the North and over 1000 feet to the Northwest, the most likely directions of flow from the sediment trap outlets.

9) BMP #12 – Verify what type of noise mitigation will be used, sound walls or hay bales.

Verdad will use a 32' soundwall on the west side of the pad.

[Quoted text hidden]

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

Tue, Mar 3, 2020 at 4:46 PM

To: Heather Mitchell <HMitchell@verdadresources.com>

Cc: John Noto - DNR <john.noto@state.co.us>

Heather,

I want further clarification on a few of these. I left you a voice mail. As we seem to be speaking about slightly different things on a couple of these responses, I want to speak on the phone to clarify things before more emails are exchanged.

Thanks,

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

[Quoted text hidden]

Heather Mitchell <HMitchell@verdadresources.com>

Wed, Mar 4, 2020 at 9:44 AM

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

Cc: John Noto - DNR <john.noto@state.co.us>

Hi Brian-

A few more items after our discussion this morning. I have also updated them below in red.

1. Please remove the well depth on the water permit 22672 from the depth to ground water comment
2. You may add the depth to water to the reason for sensitive area comments
3. Verdad submitted 1041WOGLA19-0025 with Weld county on February 3, 2020 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.

Let me know if you have any other questions.

[Quoted text hidden]

[Quoted text hidden]

This location is a sensitive area due to the distance to surface water (intermittent pond) being less than 500' from the location and the depth to ground water on permit 22672 is 9'.

6) BMP #1 states that a WOGLA will be submitted. Please change the BMP language to reflect the submittal.

~~1041WOGLA19-0025 was submitted 2/3/2020.~~ Verdad submitted 1041WOGLA19-0025 with Weld county on February 3, 2020 that addresses site safety and contains an emergency action and tactical response plan. Each location is

3/4/2020

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assigned a physical address for emergency responders to locate the site in the event of an emergency.

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