



STATE OF
COLORADO

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Verdad County Line Form 2A doc no 402092786

Heather Mitchell <HMitchell@verdadresources.com>

Tue, Nov 5, 2019 at 12:48 PM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Cc: Brian Christopher - DNR <brian.christopher@state.co.us>, Allison Schieber <ASchieber@verdadresources.com>

Hi Rebecca – please see my responses in red below and revised attachments and let me know if you need anything further:

COGCC is in the process of reviewing the Form 2A for the County Line Location (doc no 402092786). In order for us to complete our review, please address the following:

1. Per earlier conversations, please provide an updated facility count and: **Reduced tank count to 32 oil and 16 water tanks**
 - a. Location Drawing with the new facilities and cultural distances. Please note there is not a Designated Outdoor Activity Area (DOAA) in the area and the child care counts as a High Occupancy Building Unit (HOB). **Revised drawing attached**
 - b. A new facility layout drawing with the revised facilities. **Revised drawing attached**
2. Under the cultural resource section, the Location is a Buffer Zone location, therefore the multi-well pad within a designated setback location boxes should be checked. With your concurrence, I will check these boxes. **I concur**

Please provide a siting rationale for the Location, including information regarding consolidation, access, pipelines, distances from Building Units, etc.

Two pads were consolidated into one and was placed as close to the CR and away from houses as possible. This location gives us the ability to have a short access road while maximizing the distance from the pad to the BU to the North. Pipelines are going to be laid directly to the pad based off of the current configuration and will allow for the reduction of tanks and overall consolidation of the pad.

3. Under the Soils section, NRCS map unit 76 is not included, while there are only three spaces available and four units, with your concurrence, I will add NRCS map unit #76 to the Operator comments section. Please provide the NRCS map unit description. **I concur, NRCS attached**
4. Under the water resources tab, the water well referenced as the closest is has not been constructed. By the water well layer on the COGIS system, the nearest water well is approximately 995 feet to the southeast, a domestic well, permit 51244-F. The nearest water well with shallow groundwater is approximately 1,000 feet to the southwest with a depth to water at 8 feet, monitoring well permit 54621-MH. With your concurrence, I will update this information in the water resource section. **I concur**
5. Under the BMP section:
 - a. BMP #1 regarding the WOGLA, #3 regarding Adams County, and #4 regarding community outreach are all better suited for a comment and not a BMP. With your concurrence, I will move this information to the operator comments section. **I concur**
 - b. Under BMP #2 please clarify the monitoring wells and which COGCC regulation and agreement. "Verdad is finalizing an agreement with ECCV with BMPs to protect the water supply. Verdad will install monitoring wells on our well pad and conduct regular sampling of wells pursuant to COGCC regulation and agreement."

As part of BMP #2, Verdad agreed to water quality sampling and monitoring requirements consistent with COGCC regulations provided in Rule 381A.F. In addition, Verdad agreed to install two groundwater monitoring wells on the pad at depths to cover the Beebe Draw Aquifer and the Head Protection Area with a schedule for sampling and sharing results. With respect to the agreement, Verdad had been working cooperatively with ECCV on their form agreement, which Verdad understands has been utilized by ECCV with a number of other operators to address groundwater monitoring wells. Unfortunately, ECCV has withdrawn from those discussions on the advice of its outside counsel and will not execute the agreement preferring to wait until the conclusion of the rulemakings in 2020. Verdad remains willing to enter into the agreement with ECCV, but due to lease expiration issues, Verdad cannot wait until after the completion of the rulemakings to begin its operations on the Countyline pad. Important here is that despite not having the agreement in place with ECCV, Verdad is committed to and has agreed to implement all of the ECCV requests for well monitoring. Moreover, Weld County has approved the WOGLA for the Countyline pad, which includes the well monitoring program that ECCV proposed. Verdad, respectfully requests that the Staff proceed with review and approval of the Countyline pad.

c. BMP #7 regarding stormwater, references the CDPHE permit and is unclear for some of the control measures, please consider providing a revised stormwater BMP. 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: or 2-inch to 4-inch stone. Storm water controls will be 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 “

e. As this is a Designated Setback Location for a Buffer Zone, please provide all of the 604.c.(2) BMPs, including:

i. B- Closed Loop system and pit restrictions

Verdad will use a closed loop system

ii. C – flowback – will there be temporary tanks on location post completions for the high flowback water time frame? What emissions controls will be used during flowback, are there temporary VOC or VRUs?

We will use controlled temporary tanks for flowback. The temporary tank emissions will be controlled with an enclosed combustor.

iii. D – traffic plan and coordination with the local government

Verdad notified Lochbuie and Adams county of operations. Lochbuie provided no comment. Adams provided comment, but none related to the Road. We have an Approved WOGLA with Weld county on this location

iv. E – Multi-well plan – can include consolidation of 2 locations to 1.

Attached

v. F – Leak detection for flowlines and at well or production connections, include inspections and testing, what will happen if a leak is detected?

AVO (Audio, Visual, Olfactory) inspections of pipe and connections will be performed daily on production equipment to detect leaks which will be immediately corrected, repaired and reported to COGCC as required.

vi. K – pit level indicators – on tanks during drilling and completions .
No pits will be on location, but there are level indicators on the drilling mud tanks

vii. M – fencing- The location will be fenced

viii. N – Fire control for both 25 feet and 606.d of 50 feet of flammable

liquids

- Flammable liquids will not be stored within fifty (50) feet of the wellbore.
- Any material not in use that might constitute a fire hazard shall be removed a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area shall
- comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado.
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ix. O – loadlines

All loadlines shall be bullplugged or capped.

x. Q – Guyline anchors – will they be used or base beams

All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.

xi. R – tank specifications

All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). The operator shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director. Only the 2008 version of NFPA Code 30 applies to this rule. This rule does not include later amendments to, or editions of, the NFPA Code 30. NFPA Code 30 may be examined at any state publication depository library. Upon request, the Public Room Administrator at the office of the Commission, 1120 Lincoln Street, Suite 801, Denver, Colorado 80203, will provide information about the publisher and the citation to the material.

xii. S – Access roads, maintenance

At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements, and shall be maintained in a reasonable condition.

Access road permit through the county.

xiii. U – P&A wells

The operator shall identify the location of the wellbore with a permanent monument as specified in Rule 319.a.(5). The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument.

Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris. For good cause shown, an extension of time may be granted by the Director.

xiv. 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 (see Rule 322).

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- 6. Please provide a 305.a. pre-application notification certification letter stating that the letters were sent to Building Units within the Buffer Zone 30-days prior to submitting the Form 2A. **Attached.**
- 7. Please provide a 306.e certification regarding any meetings with LGDs or Building Unit owners during the 305.a. and 305.c. notification process. **Attached.**
- COGCC has also reviewed the Location for the SB19-181 Objective Criteria. The Location meets the following criteria:
- #1 – The Location is in a Buffer zone and within 1,500 feet of multiple Building Units. Please provide any information regarding outreach beyond the buffer zone Building Units.
- **Verdad had a community meeting with the surrounding neighborhood.**
- #3 – The Location is within 1,500 feet of the municipality of Lochbuie and Adams County. Please provide information regarding interactions with Lochbuie. Information regarding interactions with Adams and Weld County are provided on the 2A.

NO response from Lochbuie. Adams responded with the following requests and Verdad agreed.

Comment 1: The pad location is in Weld County and this specific segment of 168th Avenue is maintained by Weld County, which gives them the authority to determine the required road improvements. *Adams County Development Engineering has no comments regarding the proposed development.*

Comment 2: Provide screening along the southerly and easterly pad perimeters to provide for visual mitigation.

Comment 3: Pursuant to Rule 804, paint tank battery and accessory, permanent structures in uniform, non-contrasting, non-reflective color tones with the colors matched to, but slightly darker than the surrounding landscape.

Comment 4: Require final landscaping of the disturbed areas along the south and southwest perimeter in a manner that is compatible with surrounding landscape to include provisions for landscape maintenance and weed management.

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- #5.c. sensitive environment for proximity to surface water and shallow groundwater. Please clarify BMPs as above for protection of surface and groundwater.

Installation of ground water monitoring wells as depths to cover the Head Protection Area and Beebe Draw Aquifer.

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: or 2-inch to 4-inch stone

Stormwater controls will be 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

- #6. Location is within a CPW mapped SWH and RSO for an Eagles nest. A pre-consultation with CPW occurred on 10/26, please provide information regarding that consultation.
- The RSO was lifted as it was identified by CPW with COGCC employees present that the nest was an auxiliary nest for the Eagles and not their main nest. #8 – more than 18 produced hydrocarbon storage – please provide information for safety and inspections of the location and any additional information regarding the number of tanks

[Quoted text hidden]

6 attachments



F2A_COUNTYLINE_3107_3112_3130_LOCATION_DRAWING_REV4.pdf
7630K



COUNTY_LINE_PAD_FACILITY_LAYOUT_REV3.pdf
3572K



NRCS 76.pdf
95K



306c meeting certification.pdf
116K



operator certification 305a- preapplication notification.pdf
241K



CD_COUNTY_LINE_PAD_MWPLAN_REV1.pdf
696K