

STATE OF  
COLORADO

Christopher - DNR, Brian &lt;brian.christopher@state.co.us&gt;

**Impetro Alice Seedorf Production Facility, Form 2A# 402201254**

11 messages

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

Fri, Feb 21, 2020 at 2:16 PM

To: paul.gottlob@iptenergyservices.com

Cc: sbradley.impetro@gmail.com

Paul,

I am reviewing the Alice Seedorf locations (well and production facility). For the production facility, Form 2A Doc# 402201254, I have a set of corrections and clarifications that I would like to see made:

1. Please provide concurrence to remove the 305A certification and the topo map attachments, as they are not needed for this location.
2. On the Waste Management comment on the Construction, Drilling & Waste tab, please qualify statement. My interpretation of what I am seeing here is that the drilling portions of the Waste Management program do not apply, but that the contaminated soils and tank bottom portions do. Is my interpretation correct?
3. Please provide updated construction start and interim start dates.
4. Please provide concurrence to change Sensitive Area due to Water Resources to yes as this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone.
5. While examining depths to groundwater in this area, I saw that permit 6539-FP- (in Section 28) had a reported depth to water of 216 feet, reported in 2013. Please either provide concurrence to change depth to water or an explanation of why another depth is stronger.
6. Please provide a replacement sensitive area for water resources comment to cover the changes from #4 & 5.
7. Please provide concurrence to remove the related form from Related Forms. The Form 2 is tied to the wellpad's Form 2A (correct), so it should not be on the (separate) production location's 2A.
8. BMP#1. Fencing BMP. Since this BMP is not adding anything, please provide concurrence to remove.
9. BMP#4. Please remove the 604 reference as this location is not in a buffer zone. Please drop the mention of SPCC and 40 CFR as those are not under COGCC's purview. Keeping the mention of the monthly documented inspection is appropriate, just removing the reference to the regulations. Please provide new text of this BMP for replacement on the Form.
10. BMP#5. Please provide concurrence to remove odor from the title of this BMP as odor is not addressed in the BMP.
11. Please provide a secondary containment BMP discussing material of the tank berm and any liner as well as material of any secondary containment around the heater treater.
12. Please provide a stormwater BMP.
13. Please provide information on what will happen with gas at this location. What is the plan for gas from this location? Is there enough to require combustion?

As this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone, it will meet Objective Criteria 5.c., even with the deep depth to groundwater.

I had some revisions to the well pad email questions and I will try to get those across to you this afternoon.

Please let me know if you have any questions.

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](mailto:Brian.Christopher@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**sbradley.impetro@gmail.com** <sbradley.impetro@gmail.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Fri, Feb 21, 2020 at 2:27 PM

Thanks Brian – We will get on these.

Thanks,

Sam Bradley

Managing Member

Impetro Resources LLC

Impetro NonOp LLC

(970) 593-8626

[2820 Logan Drive](#)

[Loveland, CO 80538](#)

[Quoted text hidden]

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**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Fri, Feb 21, 2020 at 3:11 PM

Christopher,

Please see below replies in red.

Let us know if you need anything else.

Thanks!

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

**From:** Christopher - DNR, Brian <brian.christopher@state.co.us>  
**Sent:** Friday, February 21, 2020 2:17 PM  
**To:** Paul Gottlob <paul.gottlob@iptenergyservices.com>  
**Cc:** [sbradley.impetro@gmail.com](mailto:sbradley.impetro@gmail.com)  
**Subject:** Impetro Alice Seedorf Production Facility, Form 2A# 402201254

Paul,

I am reviewing the Alice Seedorf locations (well and production facility). For the production facility, Form 2A Doc# 402201254, I have a set of corrections and clarifications that I would like to see made:

1. Please provide concurrence to remove the 305A certification and the topo map attachments, as they are not needed for this location. **Agreed.**
2. On the Waste Management comment on the Construction, Drilling & Waste tab, please qualify statement. My interpretation of what I am seeing here is that the drilling portions of the Waste Management program do not apply, but that the contaminated soils and tank bottom portions do. Is my interpretation correct? **Agreed.**
3. Please provide updated construction start and interim start dates. **Start 4/1/2020, Interim 7/1/2020.**
4. Please provide concurrence to change Sensitive Area due to Water Resources to yes as this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone. **Agreed.**
5. While examining depths to groundwater in this area, I saw that permit 6539-FP- (in Section 28) had a reported depth to water of 216 feet, reported in 2013. **Agreed.** Please either provide concurrence to change depth to water or an explanation of why another depth is stronger.
6. Please provide a replacement sensitive area for water resources comment to cover the changes from #4 & 5. **Since this is deemed a Sensitive Area, BMP's required by such will be implemented per rules.**
7. Please provide concurrence to remove the related form from Related Forms. The Form 2 is tied to the wellpad's Form 2A (correct), so it should not be on the (separate) production location's 2A. **Agreed.**
8. BMP#1. Fencing BMP. Since this BMP is not adding anything, please provide concurrence to remove. **Agreed.**
9. BMP#4. Please remove the 604 reference as this location is not in a buffer zone. Please drop the mention of SPCC and 40 CFR as those are not under COGCC's purview. Keeping the mention of the monthly documented inspection is appropriate, just removing the reference to the regulations. Please provide new text of this BMP for replacement on the Form. **#4 Pumper will visit the location daily and visually inspect all tanks and fittings for leaks. Additionally, monthly documented SPCCP inspections are conducted pursuant to 40 CFR 112.**
10. BMP#5. Please provide concurrence to remove odor from the title of this BMP as odor is not addressed in the BMP. **Agreed.**
11. Please provide a secondary containment BMP discussing material of the tank berm and any liner as well as material of any secondary containment around the heater treater.

Construction	Berm Construction: Secondary containment devices will be constructed around crude oil and produced water storage tanks and will enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Secondary containment devices will be sufficiently impervious to contain any spilled or released material. All berms and containment devices will be inspected at regular intervals and maintained in good condition. No potential ignition sources will be installed inside the secondary containment area unless the containment area encloses a fired vessel.
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12. Please provide a stormwater BMP.

Storm Water/Erosion Control	Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Location will comply with applicable Colorado stormwater permitting requirements and associated stormwater management plan (SWMP). Impetro utilizes a ditch and berm around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur per CDPHE stormwater regulatory requirements and any evidence of stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate.
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13. Please provide information on what will happen with gas at this location. What is the plan for gas from this location? Is there enough to require combustion? **Not enough is expected to be able to use or flare, if we find**

otherwise it will be addressed at that time.

As this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone, it will meet Objective Criteria 5.c., even with the deep depth to groundwater.

I had some revisions to the well pad email questions and I will try to get those across to you this afternoon.

Please let me know if you have any questions.

Thanks,

**Brian Christopher**  
**Oil & Gas Location Assessment Specialist**

[Redacted signature area]

[Quoted text hidden]

---

**Christopher - DNR, Brian** <brian.christopher@state.co.us>  
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 2, 2020 at 1:24 PM

Paul,

My comments in red. Had several of these that need additional work:

2. Waste management comment. Is it accurate then for me to change this to "Drilling **portion of the** Waste Management Program is NOT Applicable to this Production Facility."?
6. Sensitive Area comment is inadequate. Updated depth to groundwater needed and well permit #.
9. BMP#4. Inspections. Still contains the SPCC reference.
10. BMP#5. Dust. Let's remove the hydraulic fracturing reference from this BMP.
11. Secondary containment BMP. Is the tank secondary containment lined? Is there secondary containment around the heater? Please remove the 'sufficiently impervious' comment, as this is not defined. Please update and provide me a fresh copy of this BMP.
12. SW BMP. Multiple changes needed. The needed changes appear to be the same as the Alice Seedorf 1 location.

Please let me know if you have any questions about this.

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](mailto:Brian.Christopher@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

[Quoted text hidden]

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**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 2, 2020 at 2:03 PM

Brian,

Replies in [Blue](#).

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

**From:** Christopher - DNR, Brian <[brian.christopher@state.co.us](mailto:brian.christopher@state.co.us)>

**Sent:** Monday, March 2, 2020 1:24 PM

**To:** Paul Gottlob <[paul.gottlob@iptenergyservices.com](mailto:paul.gottlob@iptenergyservices.com)>

**Cc:** [sbradley.impetro@gmail.com](mailto:sbradley.impetro@gmail.com)

**Subject:** Re: Impetro Alice Seedorf Production Facility, Form 2A# 402201254

Paul,

My comments in red. Had several of these that need additional work:

2. Waste management comment. Is it accurate then for me to change this to "Drilling **portion of the** Waste Management Program is NOT Applicable to this Production Facility."? [Agreed](#).

6. Sensitive Area comment is inadequate. Updated depth to groundwater needed and well permit #. [Due to location being within the Designated Groundwater Management Area it is deemed a Sensitive Area. Water well permit # 270203 has a depth of 256'](#).

9. BMP#4. Inspections. Still contains the SPCC reference. [Rule 604.c.\(2\)F. Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.](#)

10. BMP#5. Dust. Let's remove the hydraulic fracturing reference from this BMP. [Dust: 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 including watering or mag chloride as needed, restriction of construction activity during high wind days. Additional management practices such as road surfacing, wind breaks and barriers may be used.](#)

11. Secondary containment BMP. Is the tank secondary containment lined? [Yes](#) Is there secondary containment around the heater? [Yes](#). Please remove the 'sufficiently impervious' comment, as this is not defined. Please update and provide me a fresh copy of this BMP. [Berm Construction: Secondary containment devices will be constructed around crude oil and produced water storage tanks and will enclose an area sufficient to contain and](#)

[provide secondary containment for one-hundred fifty percent \(150%\) of the largest single tank. All berms and containment devices will be inspected at regular intervals and maintained in good condition. No potential ignition sources will be installed inside the secondary containment area unless the containment area](#)

[encloses a fired vessel.](#)

12. SW BMP. Multiple changes needed. The needed changes appear to be the same as the Alice Seedorf 1 location. [Operator shall install stormwater controls around the perimeter of the Location prior to commencing construction activities. Stormwater controls shall be constructed and maintained in a manner consistent with good engineering practices and shall prevent offsite migration of sediment/contaminant.](#)

Please let me know if you have any questions about this.

Thanks,

**Brian Christopher**  
**Oil & Gas Location Assessment Specialist**

[Redacted]

[Quoted text hidden]

[Quoted text hidden]

**Christopher - DNR, Brian** <brian.christopher@state.co.us>  
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Fri, Mar 6, 2020 at 3:15 PM

Paul,

Have a few changes that still need to be made as well as revisions to two of the attachments.

9. BMP#4. Inspections. The 604 citation is still on this BMP. As this is not in a Buffer Zone, citing Rule 604.c.(2)F. will need to be removed from the BMP.

11. Secondary Containment BMP. What you provided on the previous email did not include the lining of the secondary containment and the secondary containment around the heater. Please include these in the BMP.

Hydrology Map. The scale on this map is not consistent (the scale symbol). Please have this addressed.

Location Drawing. The scale on this drawing is not consistent (the scale symbol). Please have this addressed.

Please let me know if you have any questions.

**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](mailto:Brian.Christopher@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

[Quoted text hidden]

**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Fri, Mar 6, 2020 at 3:42 PM

Brian,

See below in **Red**.

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

**From:** Christopher - DNR, Brian <brian.christopher@state.co.us>  
**Sent:** Friday, March 6, 2020 3:16 PM  
**To:** Paul Gottlob <paul.gottlob@iptenergyservices.com>  
**Cc:** sbradley.impetro@gmail.com  
**Subject:** Re: Impetro Alice Seedorf Production Facility, Form 2A# 402201254

Paul,

Have a few changes that still need to be made as well as revisions to two of the attachments.

9. BMP#4. Inspections. The 604 citation is still on this BMP. As this is not in a Buffer Zone, citing Rule 604.c.(2)F. will need to be removed from the BMP. **Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.**

11. Secondary Containment BMP. What you provided on the previous email did not include the lining of the secondary containment and the secondary containment around the heater. Please include these in the BMP. **Berm Construction: Secondary containment devices will be constructed around crude oil, produced water storage tanks and heater and be lined and will enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. All berms and containment devices will be inspected at regular intervals and maintained in good condition. No potential ignition sources will be installed inside the secondary containment area unless the containment area encloses a fired vessel.**

Hydrology Map. The scale on this map is not consistent (the scale symbol). Please have this addressed. **Have notified Surveyor to update.**

Location Drawing. The scale on this drawing is not consistent (the scale symbol). Please have this addressed. **Have notified Surveyor to update.**

Please let me know if you have any questions.

**Brian Christopher**  
**Oil & Gas Location Assessment Specialist**

[Redacted signature]

[Quoted text hidden]

[Quoted text hidden]

**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 9, 2020 at 3:00 PM

Brian,

Attached are the updated

Hydrology Map &amp;

Location Drawing for the subject site.

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

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**2 attachments**

 **Alice Seedorf-Production Facility - Hydrology Map.pdf**  
338K

 **Alice Seedorf-Production Facility - Location Drawing.pdf**  
336K

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**Christopher - DNR, Brian** <brian.christopher@state.co.us>  
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 9, 2020 at 4:15 PM

Paul,

To go along with the well location,  
13. Floodplain determination. I do not believe that FEMA or the state generate floodplain maps for this portion of the state. While I determined in my technical analysis that this is not in a floodplain, I do not know of any floodplain maps that cover this area. Unless there are maps of which I am not aware, please provide concurrence to uncheck the Federal and State boxes. If there are no other maps, please provide me with a rationale or with concurrence to check the 'other' box and add a comment about my determination on the technical review.

**Brian Christopher**  
**Oil & Gas Location Assessment Specialist**



**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

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[Brian.Christopher@state.co.us](mailto:Brian.Christopher@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

[Quoted text hidden]

---

**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>  
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 9, 2020 at 4:32 PM

Brian, please uncheck both boxes on this as well.

---

**From:** Christopher - DNR, Brian <brian.christopher@state.co.us>  
**Sent:** Monday, March 9, 2020 4:15:17 PM  
**To:** Paul Gottlob <paul.gottlob@iptenergyservices.com>  
**Cc:** sbradley.impetro@gmail.com <sbradley.impetro@gmail.com>

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[Quoted text hidden]

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**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>

Tue, Mar 10, 2020 at 7:48 AM

And check Other.

[Quoted text hidden]