

STATE OF
COLORADO

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

S&B 5-11 HZ Pad (doc no 402261082)

2 messages

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

Sat, Feb 1, 2020 at 12:50 PM

Sam,

COGCC is in the process of reviewing the Form 2A for the Oxy S&B 5-11HZ pad (doc no 4022261082). In order to complete our review, please address the following:

1. Has there been any communication with CDOT on the timing for the expansion of the highway in the area?
2. Under BMP #11 General Housekeeping discusses the loading or unloading of large tubulars during certain hours. Is this based on Johnstown's request? The "shall make all attempts" is not a firm statement. Please clarify this BMP.
3. BMP #12 for Stormwater and Erosion control, the last paragraph is specific to a different location. With your concurrence, I will remove this paragraph. Please provide a site specific stormwater control BMP.
4. BMP #23 Noise mitigation is again with the Johnstown and references "where possible" Please clarify this BMP for COGCC.
5. BMP #25 for Odor Mitigation; the closed loop system for the "maximum extent practicable" is not clear for if odors to the maximum extent practicable or if the closed loop system will only be used to practicable. Please provide a BMP without the term or phrase "maximum extent practicable" and defining what Oxy intends to do to minimize the odors. Please also provide information regarding cuttings removals vs not stock piling cuttings.

This Location meets Objective Criteria

#1 for a Building Unit within 1,500 feet;

#2 for being within a municipality (Johnstown);

#3 for being within the border of a different municipality or county (Weld County); and

#5.c. sensitive water environment.

Based on the comments under the Local Government section, Johnstown approved the Operator Agreement in December. Has the Special Review application been approved? Should the disposition of the application with the local government stay "In Process" or has it since been "approved?"

Has Oxy had any interactions with Weld County as a different jurisdiction within 1,500 feet of the Location?

Please provide information regarding the Building Unit within the Buffer zone of the Location and any community outreach to Building Units or Residents within 1,500 feet and/or 2,000 feet of the proposed Location.

Please let me know if you have any questions.

Thank you,
Rebecca

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Rebecca Treitz

Oil and Gas Location Assessment Specialist

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Sam_Samet@oxy.com <Sam_Samet@oxy.com>

Tue, Feb 18, 2020 at 4:27 PM

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

Rebecca,

Please accept the following responses regarding Form 2A for the Oxy S&B 5-11HZ pad (doc no 4022261082):

1. Has there been any communication with CDOT on the timing for the expansion of the highway in the area?

The Colorado Department of Transportation (CDOT) is aware of the plans for accessing the S&B 5-11 HZ Pad location. Kerr McGee Oil & Gas Onshore LP (KMG) obtained an access permit that has been approved by CDOT on Oct. 28, 2019. The temporary access will serve as an access point until the start of operations on the highway expansion. I-25 will be undergoing a major construction project. The interchange at Highway 56 and I-25 will be closed for construction during this spring. The interchange at Highway 60 and I-25 will be closed for construction this summer. Once initial operations are completed and High plains Blvd is constructed, the permanent access will be changed to come from the east. An access permit will be obtained from the Town of Johnstown once the road is constructed. The town of Johnston planning department is aware of this access plan.

2. Under BMP #11 General Housekeeping discusses the loading or unloading of large tubulars during certain hours. Is this based on Johnstown's request? The "shall make all attempts" is not a firm statement. Please clarify this BMP.

KMG is requesting the removal of this BMP from the submitted Form 2A (doc no 4022261082).

3. BMP #12 for Stormwater and Erosion control, the last paragraph is specific to a different location. With your concurrence, I will remove this paragraph. Please provide a site specific stormwater control BMP.

KMG is requesting replacing BMP #12 with the following site specific stormwater control BMP:

Kerr-McGee will create tertiary containment around the well pad and facility by constructing a berm/ditch around the oil & gas location with sediment traps to further protect adjacent water features, including the Ditch: 2' W and Ditch: 3' N. All piping is pressure tested and inspected for leaks prior beginning flowback. During the entirety of flowback piping is visually inspected for fluid leaks throughout the 24 hour operation. Once the wells have been turned over to production (oil, gas and water through the facility) produced water from the northern row of wells will be diverted to the temporary tanks north of the of northern facility until the tanks are no longer needed. Produced water from the southern row of wells will be diverted to the temporary tanks south of the southern facility until the tanks are no longer needed. The pipelines connecting to the temporary 500bbl tanks will be buried. Prior to produced water being transported through the pipe pressure tests will confirm pipe integrity.

4. BMP #23 Noise mitigation is again with the Johnstown and references "where possible" Please clarify this BMP for COGCC.

KMG is requesting replacing BMP #23 with the following BMP:

KMG will utilize a quiet completions fleet for completions operations on this location.

5. BMP #25 for Odor Mitigation; the closed loop system for the "maximum extent practicable" is not clear for if odors to the maximum extent practicable or if the closed loop system will only be used to practicable. Please provide a BMP without the term or phrase "maximum extent practicable" and defining what Oxy

intends to do to minimize the odors. Please also provide information regarding cuttings removals vs not stock piling cuttings.

KMG is requesting replacing BMP #25 with the following BMP:

The best management practices that will be deployed for this location are:

- A) Use of close loop systems for fluid management at all times
- B) The storage of excess drilling fluid in closed, upright tanks
- C) Odor neutralizer will be used in the active mud system for management of odors within 24 hours of receipt of a stakeholder grievance
- D) Drill cuttings will be run through a centrifugal dryer to minimize odor during temporary time on location and during transport to disposal
- E) Drill cuttings will not remain in storage at the oil and gas location for more than a 24 hours period. Disposal will occur before the end of the 24 hours period.

6. Based on the comments under the Local Government section, Johnstown approved the Operator Agreement in December. Has the Special Review application been approved? Should the disposition of the application with the local government stay "In Process" or has it since been "approved?"

The Special Review application for this location has not been approved. Currently, the disposition of the application with the local government should stay "in process".

7. Has Oxy had any interactions with Weld County as a different jurisdiction within 1,500 feet of the Location?

Weld County Local Government Designee was contacted by KMG and indicated that the comment placed in this 2A application was based on a misunderstanding of this oil and gas location and provided no other feedback.

8. Please provide information regarding the Building Unit within the Buffer zone of the Location and any community outreach to Building Units or Residents within 1,500 feet and/or 2,000 feet of the proposed Location.

There is only one building unit within 2000' of this proposed location. This building unit is owned by KMG and currently occupied. The tenant living in the building unit is aware of KMG's operational plans. KMG will provide the tenant with a copy of the CDPHE health study and COGCC fact sheet by 2/30/2020.

Thank you Rebecca and let me know if you have any other questions.

Sam Samet

Regulatory

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From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Saturday, February 1, 2020 12:51 PM
To: sam_samet@oxy.com
Subject: [EXTERNAL] S&B 5-11 HZ Pad (doc no 402261082)

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