

State of Colorado  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
402099167  
**(REJECTED)**

Date Received:  
09/18/2019

APPLICATION FOR PERMIT TO:

☒ Drill ☐ Deepen ☐ Re-enter ☐ Recomplete and Operate

TYPE OF WELL OIL ☒ GAS ☐ COALBED ☐ OTHER: \_\_\_\_\_ Refilling ☐  
ZONE TYPE SINGLE ZONE ☒ MULTIPLE ZONES ☐ COMMINGLE ZONES ☐ Sidetrack ☐

Well Name: County Line Well Number: 3130-03H  
Name of Operator: VERDAD RESOURCES LLC COGCC Operator Number: 10651  
Address: 5950 CEDAR SPRINGS ROAD  
City: DALLAS State: TX Zip: 75235  
Contact Name: Allison Schieber Phone: (720)845-6909 Fax: ( )  
Email: regulatory@verdadresources.com

RECLAMATION FINANCIAL ASSURANCE

Plugging and Abandonment Bond Surety ID: 20170009

WELL LOCATION INFORMATION

QtrQtr: SWSE Sec: 31 Twp: 1N Rng: 65W Meridian: 6  
Latitude: 40.001457 Longitude: -104.703503  
Footage at Surface: 340 Feet FSL 1745 Feet FEL  
Field Name: WATTENBERG Field Number: 90750  
Ground Elevation: 5045 County: WELD  
GPS Data: GPS Quality Value: 1.5 Type of GPS Quality Value: PDOP Date of Measurement: 07/10/2018  
Instrument Operator's Name: Eric Purcell  
If well is ☐ Directional ☒ Horizontal (highly deviated) **submit deviated drilling plan.**  
Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL FEL/FWL  
460 FSL 1592 FEL 460 FNL 1583 FEL  
Sec: 31 Twp: 1N Rng: 65W Sec: 30 Twp: 1N Rng: 65W

LOCAL GOVERNMENT INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition below. ☒ Yes ☐ No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location. ☒

The local government siting permit type is: WOGLA

The local government siting permit was filed on: 07/30/2019

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

WOGLA19-0183 approved 10/11/2019.

## LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT

Surface Ownership: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Surface Owner is: ☒ is the mineral owner beneath the location.

(check all that apply)

☐ is committed to an Oil and Gas Lease.

☐ has signed the Oil and Gas Lease.

☒ is the applicant.

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes

The right to construct the Oil and Gas Location is granted by: applicant is owner

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

## LEASE INFORMATION

Using standard QtrQtr, Sec, Twp, Rng format, describe one entire mineral lease that will be produced by this well (Describe lease beneath surface location if produced. Attach separate description page or map if necessary.)

Mineral and Lease Information:

Township 1 South, Range 65 West Section 31

Lots 31 to 36 and Lots 41-47

See attached mineral lease plat

Total Acres in Described Lease: 65 Described Mineral Lease is: ☒ Fee ☐ State ☐ Federal ☐ Indian

Federal or State Lease # \_\_\_\_\_

Distance from Completed Portion of Wellbore to Nearest Lease Line of described lease: 0 Feet

## CULTURAL DISTANCE INFORMATION

Distance to nearest:

Building: 1011 Feet

Building Unit: 871 Feet

High Occupancy Building Unit: 5280 Feet

Designated Outside Activity Area: 3837 Feet

Public Road: 324 Feet

Above Ground Utility: 728 Feet

Railroad: 1696 Feet

Property Line: 310 Feet

School Facility: 5172 Feet

School Property Line: 5172 Feet

Child Care Center: 3018 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of the Proposed Well to nearest of each cultural feature as described in Rule 303.a.(5).
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: ☒ Buffer Zone  
☐ Exception Zone  
☐ Urban Mitigation Area

- Buffer Zone – as described in Rule 604.a.(2), within 1,000' of a Building Unit  
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.  
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 08/12/2019

## SPACING and UNIT INFORMATION

Distance from completed portion of proposed wellbore to nearest completed portion of offset wellbore permitted or completed in the same formation: 199 Feet

Distance from Completed Portion of Wellbore to Nearest Unit Boundary 480 Feet (Enter 5280 for distance greater than 1 mile.)

Federal or State Unit Name (if appl): \_\_\_\_\_ Unit Number: \_\_\_\_\_

## SPACING & FORMATIONS COMMENTS

1N 65W Sec 30 E/2, Sec 31 E/2  
1S 65W Sec 6 All, Sec 7 All  
1S 66W Sec 1 E/2, Sec 12 E/2

If this Form 2 is associated with a Drilling and Spacing Unit application, provide docket number: \_\_\_\_\_

## OBJECTIVE FORMATIONS

Objective Formation(s)	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
NIOBRARA	NBRR	407-2957	2560	Sec. 30,31,6,7,1,12

## DRILLING PROGRAM

Proposed Total Measured Depth: 17164 Feet

Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:

Enter distance if less than or equal to 1,500 feet: 99 Feet ☐ No well belonging to another operator within 1,500 feet

Will a closed-loop drilling system be used? Yes

Is H<sub>2</sub>S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No (If Yes, attach an H<sub>2</sub>S Drilling Operations Plan)

Will salt sections be encountered during drilling? No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

BOP Equipment Type: ☒ Annular Preventor ☒ Double Ram ☒ Rotating Head ☐ None

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal

Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Please see Waste Management Plan attached to Form 2A.

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

## CASING PROGRAM

Casing Type	Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CONDUCTOR	24	16	65	0	80	70	80	0
SURF	13+1/2	9+5/8	36	0	1700	462	1700	0
1ST	8+1/2	5+1/2	20	0	17164	2155	17164	

☐ Conductor Casing is NOT planned

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## GREATER WATTENBERG AREA LOCATION EXCEPTIONS

Check all that apply:

- ☒ Rule 318A.a. Exception Location (GWA Windows).
- ☒ Rule 318A.c. Exception Location (GWA Twinning).

## RULE 502.b VARIANCE REQUEST

☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

## OTHER LOCATION EXCEPTIONS

Check all that apply:

☐ Rule 318.c. Exception Location from Rule or Spacing Order Number \_\_\_\_\_

☐ Rule 603.a.(2) Exception Location (Property Line Setback).

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments The distance to the nearest well completed or permitted in the same formation was measured to the County Line 3130-02H measured in 2D using GIS mapping. The distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator was measured to the Leehl 30-4 (API# 123-39470) (AL Status) operated by Extracation Oil and Gas (100160). The distance was measured in 2D using the COGCC GIS Map.

Exceptions:

Verdad self-waives Rule 318A.a. Windows and Rule 318A.c. Twinning location exceptions

Attachments:

NO SUA attached as Verdad (Applicant) is the surface owner.

Surface and minerals:

The completed portion of the wellbore does not penetrate the described lease but the lease is within the unit.

This application is in a Comprehensive Drilling Plan No CDP #: \_\_\_\_\_

Location ID: 474767

Is this application being submitted with an Oil and Gas Location Assessment application? No

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: \_\_\_\_\_ Print Name: Allison Schieber

Title: Sr Regulatory Analyst Date: 9/18/2019 Email: regulatory@verdadresources.c

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: \_\_\_\_\_ Director of COGCC Date: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

API NUMBER

05



## Conditions Of Approval

All representations, stipulations and conditions of approval stated in the Form 2A for this location shall constitute representations, stipulations and conditions of approval for this Form 2 Permit-to-Drill and are enforceable to the same extent as all other representations, stipulations and conditions of approval stated in this Permit-to-Drill.

<u>COA Type</u>	<u>Description</u>
Drilling/Completion Operations	Per COGCC Order 1-232, Bradenhead tests shall be performed according to the following schedule and Form 17 submitted within 10 days of each test: 1) Within 60 days of rig release, prior to stimulation. If any pressure greater than 200 psi, must contact COGCC engineer prior to stimulation. 2) If a delayed completion, 6 months after rig release and prior to stimulation. If any pressure greater than 200 psi, must contact COGCC engineer prior to stimulation. 3) A post-production test within 60 days after first sales, as reported on the Form 10, Certificate of Clearance.
Drilling/Completion Operations	Operator acknowledges the proximity of the listed non-operated wells. Operator assures that this offset list will be remediated per the DJ Basin Horizontal Offset Policy (option 3). Operator will submit a Form 42 ("OFFSET MITIGATION COMPLETED") stating what appropriate mitigation occurred and that it has been completed, prior to the hydraulic stimulation of this well. 05-123-07782, SACK-HIETT 1 05-123-14807, SAWYER/POWELL 32-4 05-123-15312, DREYER 32-1
Drilling/Completion Operations	Operator acknowledges the proximity of the non-operated listed well. Operator agrees to: provide mitigation option 1 or 2 (per the DJ Basin Horizontal Offset Policy) to mitigate the situation, ensure all applicable documentation is submitted based on the selected mitigation option chosen, and submit a Form 42 ("OFFSET MITIGATION COMPLETED") stating that appropriate mitigation occurred and that it has been completed, prior to the hydraulic stimulation of this well. 05-123-13340, MARGUERITE B LEHL A-1
Drilling/Completion Operations	1) Submit Form 42 electronically to COGCC 48 hours prior to MIRU (spud notice) for the first well activity with a rig on the pad and provide 48 hour spud notice via Form 42 for all subsequent wells drilled on the pad. 2) Comply with Rule 317.j. and provide cement coverage from TD to a minimum of 200' above Niobrara. Verify coverage with cement bond log. 3) Oil-based drilling fluid is to be used only after all fresh water aquifers are covered.

## Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Drilling/Completion Operations	Operator will perform anti-collision evaluation of all active (producing, shut-in, of temporarily abandoned) offset wellbores that have the potential of being within 150' feet of the proposed well prior to drilling operations. Notice shall be given to all offset operators prior to drilling.
2	Drilling/Completion Operations	Rule 604.c.1: Upon initial rig-up and at least once every thirty (30) days during drilling operations thereafter, pressure testing of the casing string and each component of the blowout prevention equipment including flange connections shall be performed to seventy percent (70%) of working pressure or seventy percent (70%) of the internal yield of casing, whichever is less. Pressure testing shall be conducted and the documented results shall be retained by the operator for inspection by the Director for a period of one (1) year. Activation of the pipe rams for function testing shall be conducted on a daily basis when practicable.
3	Drilling/Completion Operations	Alternative Logging Program - One of the first wells drilled on the pad will be logged with Open Hole Resistivity Log and Gamma Ray Log from the kick-off point to into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "Alternative Logging Program - No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.
4	Drilling/Completion Operations	Operator will comply with COGCC policy on bradenhead monitoring during Hydraulic Fracturing Treatment in the Greater Wattenberg Area per policy dated May 29, 2012.

Total: 4 comment(s)

## Applicable Policies and Notices to Operators

Notice Concerning Operating Requirements for Wildlife Protection.  
[http://cogcc.state.co.us/documents/reg/Policies/Wildlife\\_Notice.pdf](http://cogcc.state.co.us/documents/reg/Policies/Wildlife_Notice.pdf)

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402099167	FORM 2 SUBMITTED
402119730	DEVIATED DRILLING PLAN
402119731	DIRECTIONAL DATA
402148455	WELL LOCATION PLAT
402172686	MINERAL LEASE MAP
402327675	EXCEPTION LOC REQUEST
402365213	OffsetWellEvaluations Data

Total Attach: 7 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit (Rejected)	<p>This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is rejecting this application consistent with the Rejection Process – Form 2 and 2A (May 21, 2019) posted in the Form 2 and Form 2A Instructions section of our website. In compliance with § 24-65.1-108(1), C.R.S., the COGCC is returning this application to the applicant to remedy the deficiencies. The applicant may resubmit this application for COGCC review; upon determination of completeness for any resubmitted application, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review.</p> <p>In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary prior to determination of completeness:</p> <ol style="list-style-type: none"> <li>1. Deviated Drilling Survey attachment does not have the correct map view, and has incorrect survey point data.</li> <li>2. The Directional Data imported for the well path is incorrect.</li> <li>3. The WOGLA submittal date does not match the approved 2A, Doc #402092786. Please confirm date of submittal.</li> <li>4. The Cultural Distances for the High Occupancy Building Unit and the School Facility do not match.</li> <li>5. The Mineral Lease Description does not match the Township and Range of the Mineral Lease attachment, and is not in the standard qtr/qtr, township, range language.</li> <li>6. Completed portion of wellbore will cross the mineral lease described, operator comment stating "The completed portion of the wellbore does not penetrate the described lease but the lease is within the unit" is not necessary.</li> </ol>	05/27/2020
Permit	<p>Deviated Drilling Survey and Directional Data is incorrect.</p> <p>Mineral Lease description does not match Mineral Lease attachment.</p>	05/26/2020
Permit	<p>COGCC conducted the technical review for the related Oil and Gas Location Assessment permit, Form 2A document #402092786 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 4/2/2020, establishing Location ID #474767 subject to conditions included in the permit. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A. The Objective Criteria Review Memo (Doc# 2316639) can be found in the document file for this Location.</p>	05/26/2020
Engineer	<p>Emailed operator regarding offset well mitigation 19-May-2020. Feedback received 22-May-2020. The #1 and #2 wells are not supposed to be going South.</p>	05/21/2020
OGLA	<p>Public Comments received for this Form 2 are summarized and addressed in the Public Comment Consideration Memo (Doc# 2316640) saved in the file for Oil and Gas Location ID# 474767.</p>	05/20/2020
Permit	<p>Passed completeness.</p>	04/09/2020
Permit	<p>Section number for BHL does not match Well Location Plat. Location ID missing. Returned to draft per operator request.</p>	10/24/2019
Permit	<p>Return to draft per operator request.</p>	09/19/2019

Total: 8 comment(s)



## Public Comments

The following comments were provided by members of the public and were considered during the technical review of this application.

### No. Comment

### Comment Date

- |   |  |            |
|---|--|------------|
| 1 | <p>Verdad Resources LLC has applied for a permit to construct a drilling pad and a number of wells in Section 31, T1N, R65W of the 6th PM. This well is identified as "County Line 3130 -01H to -06H". Like a similar wells Extraction Oil and Gas, Inc.(Extraction) has constructed at the Mile High Duck Club Site, this well lies within the Source Water Protection Area of the East Cherry Creek Valley Water and Sanitation District Northern Water Supply Project (ECCV). ECCV owns and operates a large municipal well field just north of Barr Lake. The District has 17 wells penetrating the shallow and highly transmissive Beebe Draw Aquifer. These wells vary from 70 to 120 feet in depth and are at risk from surface or shallow contamination of the aquifer. The County Line Pad site lies in the recharge area of this aquifer immediately up-gradient of our field. The District wells feed 100,000+ customers in the ECCV and Arapahoe County Water and Waste Water Authority (ACWWA) service areas located in Arapahoe County. As such, protection of the aquifer from surface and shallow contamination sources is critical to these municipal water providers.</p> <p>ECCV has amended its Regulations to regulate oil and gas operations within its boundaries, and is working with COGCC on an Intergovernmental Agreement to acknowledge ECCV's siting, inspection, and monitoring authority with COGCC as a referral agency. Until these changes in authority are finalized, ECCV requests that COGCC provide additional scrutiny under SB 19-181 and the Director's Objective Criteria, No. 5(b). In addition, we request that COGCC not approve any final permits within ECCV's boundaries until ECCV and the operator can agree on protective measures and BMPs by separate contractual agreement.</p> <p>This comment applies to all the wells to be drilled on the County Line Pad site as identified in COGCC forms 402099155, 402099163, 402099167, 402099191, 402099194, &amp; 402099201.</p> | 04/20/2020 |
|---|--|------------|

Total: 1 comment(s)