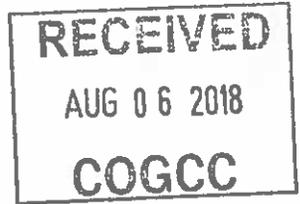


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ORIGINAL



August 1, 2018

This Document Filed under 2619194

I Jeri Yarbrough, request a public hearing for the ROY SWD #1 WELL: Surface Hole location planned at 326' FNL, 2,007' FEL, NWNE Sec.28-T1N-R66W, Weld County, Colorado

Operator:

NGL Water Solutions, LLC

I have concerns about long term groundwater contamination and the potential for contamination of nearby surface water. My domestic well # 251883 is within 600 feet and my irrigation pond within 1000 feet, of the proposed injector well location. I question the casing integrity, inspection and regulatory oversight, and potential for hazardous waste to be injected into an injection well. Simply because oil and gas recovery waste is exempt from being called hazardous waste does not make it non-hazardous for residents in my area. My concern is for the long term health and safety of my community as well as overall ecosystem health.

My property address is 14512 RD 6 Fort Lupton, Colorado 80621

Signed,

A handwritten signature in cursive that reads 'Jeri E. Yarbrough'. Below the signature is a horizontal line.



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

1120 Lincoln Street, Suite 801  
Denver, CO 80203

August 23, 2018

Ms. Jeri Yarbrough  
14512 County Road 6  
Fort Lupton, CO 80621

Dear Ms. Yarbrough,

This letter is to acknowledge receipt of your letter dated August 1, 2018. In your letter you request a hearing before the Colorado Oil and Gas Conservation Commission ("COGCC") regarding the proposed NGL Water Solutions DJ LLC ("NGL") Roy SWD #1 well. The Surface location for the proposed Roy SWD #1 is in Section 28 Township 1 North Range 66 West of Weld County.

At this time COGCC has not received permit applications from NGL for the Roy SWD #1 through Roy SWD #4 wells. Therefore COGCC feels it is premature to proceed with processing your request for a hearing.

We are requiring NGL to send a second letter to you and fellow mineral and surface owners at the same time they file formal permit applications. At that time you can resend your letter. COGCC recommends that you send us a second letter of protest to ensure your request is considered with the applicable permit application.

Please be aware that in order to be granted a hearing before the Commission, you must submit a detailed written explanation of how the construction and injection into this proposed well would harm nearby water wells, surface water (including your irrigation pond), groundwater, and/or the environment. Your reasons must be specific. We recommend you hire legal counsel to prepare your statement and represent you before the Commission.

Please feel free to contact me if you have further questions.

Sincerely,

Robert P. (Bob) Koehler, PhD.  
UIC Lead, Geology Advisor

Telephone: 303-894-2100 x5147

Email: [bob.koehler@state.co.us](mailto:bob.koehler@state.co.us)





## COLORADO

Oil & Gas Conservation  
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

September 28, 2018

Ms. Ellen Oman  
P.O. Box 337  
Brighton, CO. 80601

Mr. Eric Permut  
15492 County Road 6  
Fort Lupton, CO 80621

Ms. Jeri Yarbrough  
14512 County Road 6  
Fort Lupton, CO 80621

Anadarko Petroleum Corporation  
Attn: Mr. Brandon McGraw, Landman  
1099 18<sup>th</sup> Street, Suite 1800  
Denver, CO. 80202

Dear Ms. Oman, Mr. Permut, Ms. Yarbrough, and Mr. McGraw,

The Colorado Oil and Gas Conservation Commission (“Commission”) has received your requests to have the Commission hold a hearing in regard to permitting multiple commercial saltwater disposal wells proposed by NGL Water Solutions DJ, LLC (“NGL”) in Weld County, Colorado. As per Rule 325.m, those requesting a public hearing before the Commission must be “directly and adversely affected or aggrieved” by the proposed application. Written protests must specifically provide information on the following:

- (1) Possible conflicts between the injection zone’s proposed use and present or future use as a source of drinking water or present or future use as a source of hydrocarbons, or
- (2) Operations at the well site which may affect potential and current sources of drinking water.

These written requests should be submitted to the Hearings Manager, Julie Prine, at [Julie.Prine@state.co.us](mailto:Julie.Prine@state.co.us), no later than Friday, October 12, 2018 at 5:00 PM. You are encouraged to retain legal counsel to assist you with this process.

If the Director determines that your request provides all necessary information under the rules, a hearing will be set and you will be notified.

P 303.894.2100 F 303.894.2109 [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

Commissioners: John H. Benton - Chair, Howard Boigon - Co-Vice Chair, Tommy Holton - Co-Vice Chair,  
Ashley L. Ager, James W. Hawkins, Kent Jolley, Erin A. Overturf, Robert W. Randall, Karin McGowan  
John W. Hickenlooper, Governor | Robert W. Randall, Executive Director, DNR | Julie Murphy, Director



September 28, 2018

Page 2

As I have previously conveyed, at the time you initially expressed concern over the proposed wells, NGL had not yet formally filed applications for most of the wells in question, making it impossible for us to move forward on your requests. NGL submitted the necessary permit applications in late August through early September. The wells and documents in question are listed at the end of this letter.

Please contact me if you have any questions. A telephone call or an email should get you a quicker response.

Sincerely,



Robert Koehler, PhD.  
UIC Lead, Geology Advisor

Telephone: 303-894-2100 x5147  
Website: <http://cogcc.state.co.us/#/home>

Email: [bob.koehler@state.co.us](mailto:bob.koehler@state.co.us)

Cc:

Ms. Julie Murphy, Director  
Ms. Julie Prine, Hearings and Regulatory Affairs Manager  
Mr. James Rouse, Hearings Supervisor

See attached sheet for additional information.

South Weld SWD #1  
South Weld SWD #2  
South Weld SWD #4

Roy SWD #1  
Roy SWD #2  
Roy SWD #3  
Roy SWD #4  
Roy SWD #5

Well Name	Type of Well	Surface	Bottomhole	Form 2	Form 2A	Form 31	Form 33
South Weld SWD #1	Vertical			401574842	401575754	401600785	401602089
South Weld SWD #2*	Directional	902 FNL 1709 FEL, 30-1N-66W	1277 FSL 2638 FEL, 19-1N-66W	401755785	401756363	401756412	401756433
South Weld SWD #3		No such well proposed.					
South Weld SWD #4	Directional	1655 FNL 1713 FEL, 30-1N-66W	259 FNL 2217 FEL, 31-1N-66W	401576086	401575754	401600785	401662714

\*Refile with revised bottomhole.

Roy SWD Facility (for 5 wells)							
Roy SWD #1	Vertical	326 FNL 2077 FEL, 28-1N-66W	Same	401715613	401715678	401719855	401720052
Roy SWD #2	Directional	301 FNL 2077 FEL, 28-1N-66W	1668 FNL 2323 FEL, 21-1N-66W	401720976	401715678	401719855	401721084
Roy SWD #3	Directional	935 FNL 2169 FEL, 28-1N-66W	2327 FSL 942 FWL, 27-1N-66W	401722130	401722226	401719855	401722281
Roy SWD #4	Directional	301 FNL 2127 FEL, 28-1N-66W	1319 FNL 420 FEL, 29-1N-66W	401724848	401715678	401719855	401725366
Roy SWD #5	Directional	326 FNL 2127 FEL, 28-1N-66W	1753 FSL 1 FWL, 21-1N-66W	401759419	401715678	401719855	401759646

SWD refers to "Salt Water Disposal"	Distances in Feet	XX-1N-66w
	FNL=From North Line of Section	XX = Section 1 through 36
	FSL=From South Line of Section	1N = Township 1 North
	FEL=From East Line of Section	66W = Range 66 West
	FWL=From West Line of Section	Public Land Survey System
		All 6th Prime Meridian

Similar colors mark documents used for more than one well.

Form 2 is the drilling permit.  
Form 2A is the surface facility permit (has to be supplemented with County permit).  
Form 31 permits use of an underground formation or formations as a tank for disposing of produced water.  
Form 33 permits the well that connects the "tank" defined in the Form 31 to the surface.

Note: Forms 31 and 33 have two parts.

The Forms 31 and 33 "Intent" are plans based on a hypothetical well. An approved "Intent" does not allow injection.  
The Forms 31 and 33 "Subsequent" are based on a final physical well as constructed or converted. Approval for injection goes with a "Subsequent" 31 and 33.